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ACKNOWLEDGEMENTS

CNY Fair Housing wishes to acknowledge several individuals and organizations whose work and assistance was instrumental in completing this analysis. We would like to thank the City of Watertown Planning Department, especially Geoff Urda, for their assistance in guiding and reviewing this report. Thank you to the City of Watertown GIS Team and, in particular, Virginia Robenski for her excellent work in providing mapping for this project and Tiffany Patton for her help in formatting the report for publication. Thank you to the community partners, housing providers, and residents of Watertown who we have worked with and learned from over the years and whose experiences have helped inform this analysis. Finally, thank you to the staff of CNY Fair Housing who worked on this report, especially Catherine Porter who was the primary author and Cooper Sirwatka who contributed important insights.

Sally Santangelo Executive Director

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EXECUTIVE SUMMARY

The Analysis of Impediments to Fair Housing Choice (AI) for the City of Watertown was conducted by CNY Fair Housing, Inc., a private, non-profit organization qualified fair housing enforcement agency. As a recipient of Community Development Block Grant (CDBG) entitlement funding from the US Department of Housing and Urban Development (HUD), the City of Watertown is obligated to affirmatively further fair housing (AFFH).

To conduct this Analysis, CNY Fair Housing conducted data analysis and reviewed existing relevant studies. The analysis emphasized the impact of Fort Drum on both the local population and housing trends relating to fair housing.

There are large geographic disparities in median income and poverty rates between the city and county. Watertown's median income of \$41,339 is 21 percent less than Jefferson County's median income of \$52,268. Additionally, Watertown has a poverty rate of 25.6 percent, compared to Jefferson County's poverty rate of 14.2 percent. There is also a large geographic disparity in homeownership levels. In Watertown, only 40.2 percent of households are homeowners, compared to 55.7 percent of Jefferson County households.

Watertown additionally has an older housing stock than Jefferson County. About 82 percent of Watertown housing units were built prior to the ban of lead paint in 1979, and families with children face a higher risk from lead exposure. Even a smaller proportion of Watertown homes were built after accessibility standards for multifamily homes were enacted in 1994, making it especially difficult for residents with mobility disabilities to find suitable housing. There are higher proportions of disabled residents both city and county-wide. 17.6 percent of Watertown residents and 14.2 percent of Jefferson County residents have a disability, compared to the national average of 12.6 percent. Many fair housing complaints based in Jefferson County received by CNY Fair Housing are related to reasonable accommodation requests.

Disparities in median income, poverty and homeownership exist not only geographically, but racially in the City and County. Although both Watertown and Jefferson County are predominantly white with approximately 80 percent white residents, the city and county have diversified since 1980 with the garrison of the United States Army's 10th Mountain Division to Fort Drum. The Watertown and Fort Drum areas of Jefferson County are more diverse than the northwest and southern parts of the County. The poverty rate is higher for all racial groups in Watertown than Jefferson County, but racial disparities exist in both geographies. In Watertown, 22.2 percent of white residents live below the poverty line, compared to 51.7 percent of Hispanic or Latino and 34.8 percent of Black or African American residents. In Jefferson County as a whole, 13.0 percent of white residents live below the poverty line, compared to 22 percent of Hispanic or Latino residents and 18.6 percent of Black or African American residents. There are additionally large racial disparities in homeownership, with 44.4 percent of white households owning their home in Watertown, compared to only 18.0 percent of Hispanic or Latino and 14.3 percent of Black households. In Jefferson County, 61.7 percent of white households own their home, compared to 18.4 percent of Hispanic or Latino households and 9.0 percent of Black or African American households. Low rates of homeownership among people of color limits their ability to build household wealth.

Both Watertown and Jefferson County's population have gradually declined in recent years due to the Base Relocation and Closure (BRAC) process at Fort Drum, as the Army has phased out of the Iraq War. This has contributed to high levels of regional housing vacancy, as many homes had been built to accommodate rising troop levels in the 2000s. The Comprehensive Housing Analysis completed for the City in 2016 suggests that despite high levels of vacancy, there are low vacancy rates for affordable homes, indicating the high demand for affordable homes. Watertown additionally struggles with the presence of foreclosed and abandoned "zombie"

homes. In early 2020, Watertown had the zip code with the second highest rate of owner-vacated properties in the nation. The presence of even one of these properties can disrupt neighborhood stability.

Housing cost-burden is high both city and county wide, especially among renters. Despite having a higher median income, more Jefferson County renters are cost-burdened (46.5 percent) than City of Watertown renters (42.2 percent). However, despite high levels of renter cost burden across both the City and County, 71.2 percent of HUD-subsidized units and 70.7 percent of LIHTC units are located within the City. However, 42.5 percent of Housing Choice Voucher holders live outside the City, suggesting there is a demand for affordable homes in the surrounding Jefferson County as well. Overall, the need for quality, affordable homes impacts members of protected classes the most.

IDENTIFICATION OF BARRIERS AND RECOMMENDATIONS

The last Analysis of Impediments for the City of Watertown was completed in 2015. That document identified a set of recommendations for the City that aimed to improve housing choice and opportunity. As progress has varied, some of these recommendations are repeated in 2020.

The 2020 Analysis emphasizes the impact of Fort Drum deployment patterns on Watertown's housing market trends. These deployment changes have led to rapid changes in the area population and the local housing market has sometimes struggled to adjust. Based on these findings, this report identifies the lack of affordable, quality housing for members of protected classes, the role of vacant and zombie properties in disrupting neighborhood stability, racial disparities in homeownership, the lack of accessible housing, and housing discrimination as barriers to fair housing and housing choice in Watertown. The impediments and policy recommendations to address these barriers are summarized here and discussed in more detail later in the report.

IMPEDIMENT 1:

Lack of quality, affordable housing limits housing options for protected class members.

Recommendations:

- Strengthen code enforcement system.
 - Strengthen the rental registry to require inspections of rental properties.
 - Create a user-friendly database of codes complaints that will allow tenants to search property and landlord complaint history.
 - Set up stricter penalties against landlords with outstanding code violations such as fines, denials of construction permits, evictions, or inability to purchase a property from the City.
 - Require lead paint tests in codes inspections.
- Develop incentives to convert market-rate apartments struggling with high levels of vacancy to affordable housing.
- Promote and incentivize mixed income properties and neighborhoods through both the development of affordable housing in market-rate neighborhoods and the development of market-rate housing in high-poverty neighborhoods such as Downtown.
 - Use City of Watertown Zoning Ordinance rewrite as an opportunity to promote mixeduse and mixed-income development as the City shifts to form-based codes.
 - Advocate New York State legislators to develop and fund tax credit programs that prioritize mixed-income and scattered-site development and rehabilitation to incentivize

redevelopment and prioritize affordable housing without the consequence of concentrated poverty, as seen in Downtown Watertown.

- Address housing instability among renters.
 - Create early intervention programs that provide support to tenants when they first become late on rent.
- Continue investment into rental rehabilitation programs.
 - Complete outreach to encourage more landlords to participate in existing programs.

IMPEDIMENT 2:

Vacant housing and zombie properties undermine neighborhood stability and revitalization efforts.

Recommendations:

- Continue zombie home rehabilitation and prevention programs.
 - Identify problem homes, blocks and neighborhoods and be proactive in helping slow the growth of vacancy and dilapidation.
 - Continue efforts to rehabilitate homes in all neighborhoods as an effort to decrease the concentration of poverty in certain areas.
 - Continue to expand the Owner-Occupied Housing Rehabilitation program, funded by CDBG and implemented by Neighbors of Watertown.
 - Continue to expand and fund the NDC Housing Program, which stabilizes properties acquired by the City through the tax foreclosure process while a long-term redevelopment plan is being established.
 - Utilize NYS Brownfield Opportunity Areas Program to redevelop vacant and blighted parcels following the tasks listed in the 2019 Comprehensive Plan.
- Create a Jefferson County Land Bank or expand existing programs that facilitate the redevelopment of vacant properties, such as the Buy / Rehab / Resell Housing Rehabilitation Program.
- Work with Fort Drum to better plan for and anticipate troop fluctuations that impact the housing market.¹

IMPEDIMENT 3:

There are significant disparities in homeownership rates by race and ethnicity, limiting the ability of people of color to build household wealth.

Recommendations:

- Improve homeownership opportunities.
 - Create financial counseling programs, including financial literacy programs for high school students and non-military residents.
 - Expand homeownership counseling programs, such as the Neighbors of Watertown's First
 Time Home Buyer Education course.
 - Expand down payment assistance programs and work with local lenders to make firsttime homebuyer programs more available.

3

¹ "2019 Comprehensive Plan," City of Watertown.

- Promote Black and Hispanic homeownership through affirmative marketing programs and partnerships with local organizations.
- Promote Section 8 homeownership for voucher holders and work with local housing authorities and lenders to expand Section 8 homeownership.
- Identify and expand upon programs to provide alternative mortgage lending options that allow for funding for housing rehabilitation.

IMPEDIMENT 4:

A large percentage of the population has disabilities, particularly ambulatory difficulties, which creates a need for accessible housing.

Recommendations:

- Identify and support scattered site housing options that promote integration of people with disabilities into the community.
- Develop incentives for creating accessible housing or modifying homes to be more accessible.
- Assure that all new construction or substantial rehabilitation complies with required accessibility guidelines. Monitor new construction prior to completion to identify accessibility violations while they are easier to correct.
- Explore passage of a visitability regulation that requires that all new construction of both multi and single-family homes conform with basic accessibility requirements.

IMPEDIMENT 5:

Housing discrimination and lack of knowledge of fair housing rights continues to limit housing opportunities.

Recommendations:

- Continue support for fair housing education and outreach programs. Target programs to reach tenants directly through written, digital, and in-person activities.
- Support fair housing enforcement programs including fair housing testing of housing providers in the rental, sales, and lending markets.
- Include fair housing education materials in all housing assistance programs.
- Partner with other municipalities within Jefferson County to expand reach of fair housing education programming.
- Require that all subrecipients of CDBG funds complete fair housing training.

INTRODUCTION

Following the 2010 United States Census, the White House Office of Management and Budget designated the Watertown-Fort Drum, NY urbanized area as a Metropolitan Statistical Area (MSA), with Watertown identified as the principal city. As a result, the City of Watertown, which had previously participated in New York State's Community Development Block Grant (CDBG) Small Cities Program, became a CDBG Entitlement Community, now receiving its funds directly from the U.S. Department of Housing and Urban Development (HUD). As recipients of CDBG entitlement funding from HUD, the City of Watertown has certified that it will affirmatively further fair housing. As part of its efforts, the City is conducting this Analysis of Impediments to identify barriers to fair housing and develop strategies to address those barriers. This will be the City's second Analysis of Impediments, the first of which was written in 2015.

Since 1994, Jefferson, Lewis and St. Lawrence Counties have operated cooperatively as the North Country Home Consortium (NCHC). The NCHC receives an annual allocation of Home Investment Partnerships Program (HOME) funds directly from HUD. As such, the NCHC has also certified that it will affirmatively further fair housing and bears the same requirement to complete an AI at regular intervals. Given that the NCHC consists of three counties, and since the City of Watertown was never previously an entitlement community under CDBG, previous iterations of the NCHC's AI were region-wide analyses and did not include City-specific sections.

BASIS OF THIS STUDY

Under the Fair Housing Act, the US Department of Housing and Urban Development (HUD) is obligated to administer its programs in such a way as to "affirmatively further fair housing" (AFFH), a requirement that extends to grantees of HUD programs. The Community Development Block Grant (CDBG) program specifically contains a regulatory requirement that entitlement jurisdictions certify that they will affirmatively further fair housing as a condition of the receipt of that funding.

Up until September of 2020, this obligation to AFFH, required the jurisdiction to pursue the following broad objectives:

- Analyze and eliminate housing discrimination in the jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promote housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities;
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.²

Specifically, the AFFH obligation required the grantee to:

- 1. Conduct an analysis to identify impediments to fair housing choice within the jurisdiction
- 2. Take appropriate actions to overcome the effects of any impediments identified through the analysis
- 3. Maintain records reflecting the analysis and actions in this regard.³

As defined by HUD, impediments to fair housing choice are:

² Office of Fair Housing and Equal Opportunity, U.S. Department of Housing and Urban Development, Fair Housing Planning Guide, (Washington, DC. March 1996), Vol. 1, 1-3.

³ Ibid, 1-2

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability
 of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.⁴

While the obligation to AFFH arises in connection to the receipt of HUD funds, the obligation extends beyond the operation of HUD-funded programs and applies to all public and privately-funded housing and housing-related activities in the jurisdiction.⁵

In July 2020, HUD instituted a new AFFH rule that significantly pared back the AFFH requirements. Under this rule, municipalities are no longer required to complete an Analysis of Impediments or other fair housing analysis. At the time of the new ruling, CNY Fair Housing had already started the AI and the City of Watertown opted to proceed with this Analysis in recognition of the importance of understanding the housing issues facing local residents.

OVERVIEW OF FAIR HOUSING LAWS

A combination of federal, state, and local fair housing laws applies in Watertown. The first housing discrimination protections were established with the Civil Rights Act of 1866, which held that "all citizens of the United States shall have the same right, in every State and Territory, as is enjoyed by white citizens thereof to inherit, purchase, lease, sell, hold, and convey real and personal property." While by statute, the Act bans discrimination on the basis of race or color, through case law, it has been determined to prohibit discrimination on the basis of national origin and religion as well.

The 1866 Act went largely unenforced. To address the continuing unequal access to housing, particularly for racial minorities, Congress passed Title VIII of the Civil Rights Act of 1968, the Fair Housing Act, which prohibits discrimination in housing based on race, color, religion, and national origin. The Fair Housing Act was amended in 1974, to included sex as a protected class and in 1988, to include disability and familial status.

In addition to these federal laws, additional protected classes have been established under state and local laws. New York State Executive Law §296 prohibits discrimination on the basis of race, color, creed, national origin, sex, familial status, disability, age, marital status, military status, sexual orientation, and source of income.

Fair housing laws apply to all housing-related transactions including real estate sales, rentals, mortgage lending, homeowner's insurance, zoning and housing-related harassment.

The Fair Housing Act specifically identifies prohibited practices in Sections 3604, 3605, 3606 and 3617. These prohibited practices include:

- To refuse to sell or rent, to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of their membership in a protected class.
- To discriminate against any person in the terms, condition, or privileges of sale or rental of a dwelling, or
 in the provision of services or facilities in connection therewith, because of their membership in a
 protected class.

⁴ Ibid, 2-8. Emphasis added.

⁵ Ibid, 1-3.

- To make, print, or publish, any notice, statement, or advertisement, with respect to the sale or rental of
 a dwelling that indicates any preference, limitation, or discrimination based on membership in a protected
 class.
- To represent to any person because of race, color, religion, sex, handicap, familial status, or national origin that a unit is not available for inspection, sale, or rental when such dwelling is in fact so available.
- To refuse to permit a reasonable accommodation or modification for a person with a disability when such an accommodation or modification is necessary to afford such person equal opportunity to use and enjoy a dwelling.
- A failure to design and construct multi-family housing to meet accessibility standards.

While discrimination can occur overtly, such as a landlord stating that they will not rent to a family with children, the law also covers practices that are less direct. One such area is differential treatment. For example, a landlord cannot apply a more stringent application process to members of a protected class. Another category of practices covered under the law is disparate impact. These are practices that are seemingly neutral yet have a disproportionate negative impact on members of a protected class. For example, a landlord may institute a policy that they will only accept income from work to verify that someone is qualified to rent a unit, however this practice could have a disproportionate effect on people with disabilities or women with children who receive child support. Regardless of the landlord's intent, the discriminatory effect of these practices would constitute a violation of Fair Housing laws.

Under these provisions, a range of historical practices that have the effect of limiting access to housing for members of protected classes have been interpreted to be illegal under the Fair Housing Act. These include racial steering, exclusionary zoning, blockbusting, discriminatory advertising, and redlining in mortgage, insurance, and appraisals.

Both the Fair Housing Act and New York State Human Rights Law provide an administrative process to investigate complaints and pursue legal action on behalf of victims of discrimination. Individuals may file administrative complaints with HUD or the New York State Division of Human Rights which is considered a substantially equivalent agency. Complaints filed with HUD are referred to the Division of Human Rights for investigation. If violations are proven, victims are eligible for monetary compensation and affirmative relief. Injured parties, including organizations, may also file civil cases on their own in state or federal court.

DEFINING THE ANALYSIS

Impediments to fair housing choice are those factors which may preclude an individual or household from living where they would freely choose to live, or which cause them to live under less favorable circumstances than equal treatment under the law would dictate. In other words, absent barriers which relate to federal and state fair housing laws, these individuals or households would reside elsewhere and/or be free of negative circumstances which accrued to them through unfair housing practices.

The Analysis of Impediments to Fair Housing Choice seeks to identify not only if these prohibited practices are present within a community, but also looks broadly at housing and housing-related issues. Impediments to fair housing are not merely acts of discrimination, but any factor that limits the access to housing opportunities for members of protected classes. Thus, an impediment could be a discrete act of discrimination such as a landlord's refusal to rent to someone with a mobility impairment. Impediments can also be a broad public policy, or lack of public policy, such as the failure of a municipality to ensure an adequate supply of accessible, affordable housing for people with disabilities.

As defined by HUD, impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability
 of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.⁶

To identify impediments, an AI involves conducting a comprehensive review of the jurisdiction's laws, regulations, and administrative policies, procedures, and practices; an assessment of how those laws, etc., affect the location, availability, and accessibility of housing; and an assessment of conditions, both public and private, affecting fair housing choice.⁷

Based on this review, an Analysis should seek to identify and prioritize fair housing issues, identify the most significant determinants related to these issues, and establish goals for addressing the determinants.

LIMITS TO AN ANALYSIS

The purpose of this report is to identify fair housing impediments and make recommendations for the City of Watertown. The City, however, does not exist in a vacuum. Regional issues impact the housing choices that individuals in the City face and some recommendations may necessarily involve regional approaches. For this reason, some discussion of regional housing and demographic trends will be necessary particularly to provide context to housing choices for protected classes within the City.

METHODOLOGY

To evaluate the barriers to housing choice in the City of Watertown, CNY Fair Housing conducted several research activities:

- Data analysis and mapping;
- Review of documents and existing studies; and
- Qualitative input from local government officials, service providers, housing providers, and residents.

Data Analyses

In conducting this analysis, data was utilized from numerous sources. The primary data source for the original maps and charts created by CNY Fair Housing and the City using 2014-2018 American Community Survey (ACS) 5-year estimates from the United States Census Bureau. Secondary sources include the NYS Department of Education data, Home Mortgage Disclosure Act data, and HUD data. Additional data is derived from public documents for the City of Watertown.

Document and Study Review

Several documents and studies were reviewed to inform this analysis including the following:

- City of Watertown 2016-2020 Consolidated Plan
- City of Watertown December 2019 Strategic Goals and Objectives
- City of Watertown Analysis of Impediments to Fair Housing, 2015
- Fiscal Year 2019 Fort Drum Economic Impact Statement

⁶ Ibid, 2-8. Emphasis added.

⁷ Ibid, 2-7.

- Comprehensive Housing Analysis, Watertown Housing Market and Vacant and Distressed Housing Concerns, 2016, GAR Associates
- City of Watertown 2018-2019 CAPER
- City of Watertown 2020 Action Plan
- City of Watertown 2019 Comprehensive Plan
- Jefferson County Profile, 2017, Cornell Program on Applied Demographics
- Jefferson County Community Health Assessment, 2019-2021

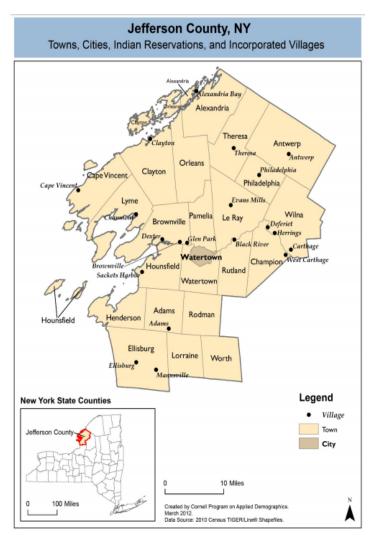
PROFILE OF THE CITY OF WATERTOWN

GEOGRAPHY

The City of Watertown is in New York's North Country region and serves as the County Seat for Jefferson County. Watertown is a small city with a population of 26,057 that accounts for 22.8 percent of Jefferson County's total population of 114,448.8 Map 3 identifies Watertown neighborhoods that will be discussed in this analysis.

Jefferson County is home to 22 towns and 20 villages, and is bordered by St. Lawrence County to the northeast, Lewis County to the east, Oswego County to the south, Lake Ontario to the west, and the international boundary with Canada to the northwest. Fort Drum, a U.S. Army base and home to the 10th Mountain Division, is in the northeast corner of Jefferson County, as shown in Map 2. The region's demographic, economic, and housing patterns are inextricably connected to Fort Drum's size and population trends. Additionally, the Thousand Islands are a popular tourist destination within the region.

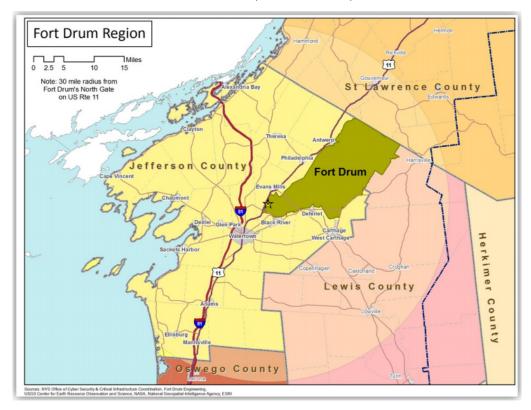
MAP 1: JEFFERSON COUNTY, NY



SOURCE: JEFFERSON COUNTY PROFILE, 2017, CORNELL PROGRAM ON APPLIED DEMOGRAPHICS.

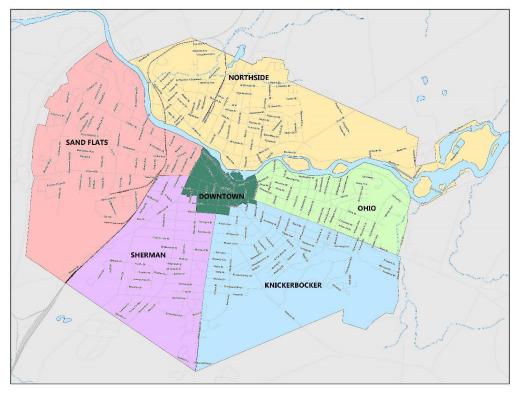
⁸ "Quick Facts: Watertown city, New York," United States Census Bureau, 2018, https://www.census.gov/quickfacts/watertowncitynewyork.

MAP 2: FORT DRUM, JEFFERSON COUNTY, NY



Source: 2019 Fort Drum Economic Impact Statement.

MAP 3: WATERTOWN NEIGHBORHOODS



SOURCE: CITY OF WATERTOWN 2019 COMPREHENSIVE PLAN.

DEMOGRAPHIC PATTERNS

As with many Upstate New York cities, Watertown's population has significantly decreased with the decline of the manufacturing sector, falling 25 percent from its height of 34,350 in 1950.9 However, Jefferson County's population has increased since 1940, matching national patterns of suburbanization. Additionally, the U.S. Army garrisoned the new 10th Mountain Division to Fort Drum in 1984, leading to a large population increase from 1980 and 1990, as shown in Figure 1. Since 2000, Watertown's population has fluctuated. The City's population slightly increased from 2000 to 2010 as a result of the increase in Fort Drum troop strength due to the U.S. wars in Afghanistan and Iraq. However, this growth was not sustained, and Watertown's population continues to gradually decline. The neighborhood with the most stable population in Watertown is the Northside, which is also the largest with 6,500 residents in 2018. In comparison, fewer than 1,000 people lived in Downtown Watertown.

Jefferson County's population also significantly grew during the first decade of the 21st Century due to the wars in the Middle East. In 2004, a 3rd Brigade Combat Team and 6,000 soldiers were added to Fort Drum, contributing to a large population increase. However, in August of 2014, this Combat Team was inactivated as a part of the Base Relocation and Closure (BRAC) process.11 Two thousand of the 3rd Brigade's 3,500 soldiers were absorbed by the 1st and 2nd Brigades, but there was still a net loss of 1,500 uniformed positions. The impacts of this loss have been felt at both the City and County level. However, Fort Drum personnel still compose a large portion of the North Country's population. Table 1 below shows that in 2019, 76,623 people in the region were Fort Drum personnel, either as active duty military, dependents, contractors, or retirees.

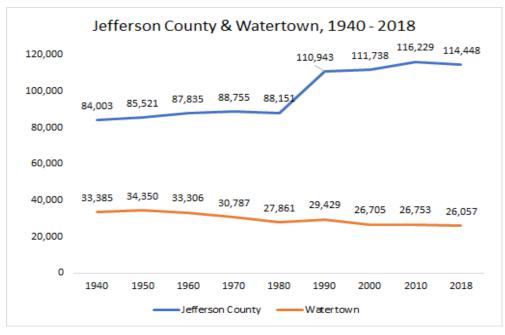


FIGURE 1: POPULATION OF JEFFERSON COUNTY & WATERTOWN, 1940 - 2018

SOURCE: "JEFFERSON COUNTY PROFILE, 2017" CORNELL PROGRAM ON APPLIED DEMOGRAPHICS, 2010 & 2018 ACS 5-YEAR DATA.

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⁹ "Consolidated Plan – Program Years 2016 – 2020," City of Watertown Planning Office, May 2, 2016.

¹⁰ "Comprehensive Plan: City of Watertown, New York," City of Watertown, 2019, https://www.watertown-ny.gov/DocumentView.asp?DID=1840.

¹¹ Ibid.

TABLE 1: FORT DRUM POPULATION, 2019

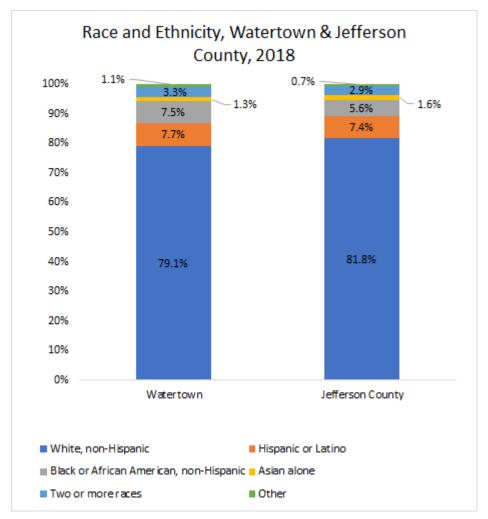
Fort Drum Population

Type of Personnel	Amount
Active Duty (AD) Military (4Q19 post population report)	15,154
Dependents of AD Military within 40 miles (FY2018 DEERS data from DMIS)	17,171
Transient and Rotational Military (4Q19 post population report)	23,288
Government Civilians (4Q19 post population report)	2,897
Contractor Personnel (4Q19 post population report)	820
Other Civilian Organization Personnel (4Q19 post population report)	277
Retirees in 136XX Zip Code (Office of the Actuary, FY18 Statistical Report, dtd MAY19)	3,340
Dependents of Retirees within 40 miles (FY2018 DEERS data from DMIS)	12,724
Other Military, Civilian Dependents within 40 miles (FY18 DEERS)	673
Survivors in 136xx Zip Code (Office of the Actuary, FY18 Statistical Report, dtd MAY19)	279
Total	76,623

Source: 2019 Fort Drum Economic Impact Statement.

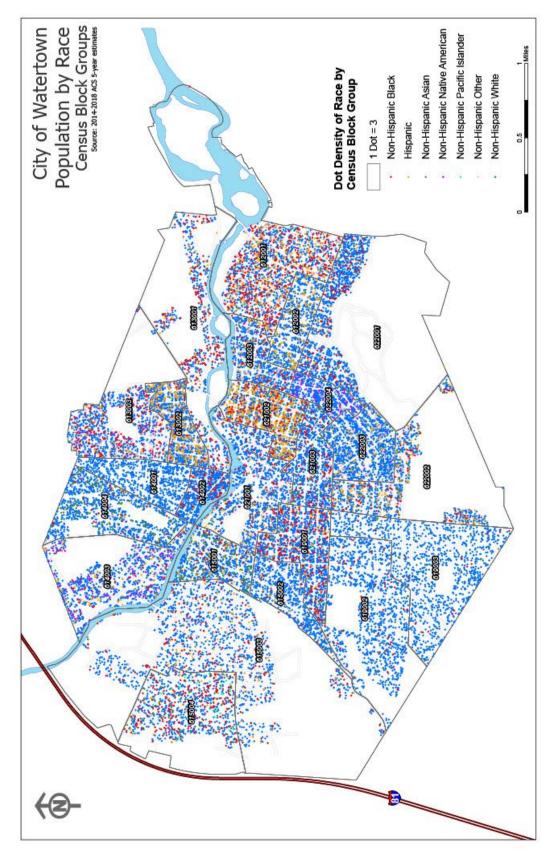
The impacts of race and ethnicity demographic patterns on fair housing are particularly important. The respective populations of Watertown and Jefferson County are 79.1 percent and 81.8 percent white, non-Hispanic. While the City of Watertown has a much smaller percentage of people of color than New York State, the proportion of people of color within the City is slightly higher than the County as a whole. This difference is largely accounted for in the difference in the percentage of Black residents between the City (7.5 percent) and County (5.6 percent), as shown in Figures 2 and 3. Additionally, there is also a small foreign-born population in both geographic areas, composing only 4.3 percent of Watertown's and 3.8 percent of Jefferson County's population.

FIGURE 2: RACE AND ETHNICITY, WATERTOWN & JEFFERSON COUNTY, 2018



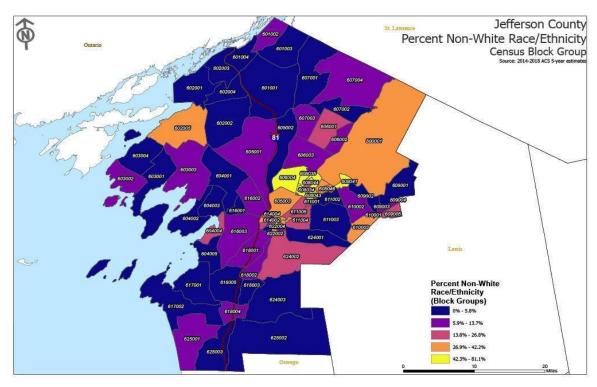
Source: 2014-2018 ACS 5-YEAR DATA.

The racial dot map below illustrates that the most diverse areas of the City are the Northside and Ohio Neighborhoods (East of Downtown). Map 5 illustrates that in Jefferson County as a whole, the communities surrounding Fort Drum have the highest percentage of non-white residents. The City of Watertown and Fort Drum itself are also significantly more diverse than the surrounding towns and villages. Northwest and Southern Jefferson County especially lack diversity. Figure 3 illustrates the increase in the proportion of residents of color and a decrease in the proportion of white residents in Jefferson County after the 10th Mountain Division was garrisoned at Fort Drum in 1984.



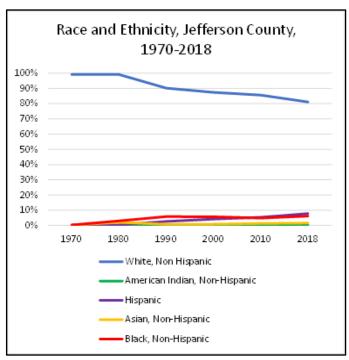
SOURCE: 2018 5-YEAR ACS DATA.

MAP 5: PERCENT NON-WHITE BY CENSUS BLOCK GROUP, JEFFERSON COUNTY, 2018



SOURCE: 2018 5-YEAR ACS DATA.

FIGURE 3: RACE AND ETHNICITY, JEFFERSON COUNTY 1970-2018

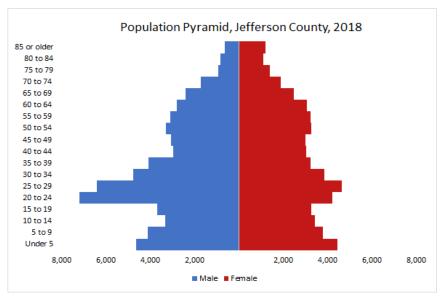


SOURCE: 1970-2010 CENSUS AND 2018 5-YEAR ACS DATA.

Fort Drum's presence also significantly impacts household type and age in Jefferson County and Watertown. Figure 4 below is a population pyramid that clearly illustrates the largest age cohorts in the County are 20 to 29-year-old males, likely Fort Drum personnel. There is a similar but smaller concentration of women ages 20 to 29 as well. Figure 5 shows that these patterns are also seen in the City of Watertown.

Additionally, both the City and County also have a large bump in the number of children under 5 and ages 5-9. This is also likely due to Fort Drum, as

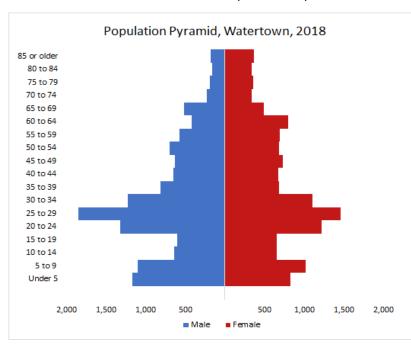
FIGURE 4: POPULATION PYRAMID, JEFFERSON COUNTY, 2018



SOURCE: 2018 5-YEAR ACS DATA.

soldiers in their 20s are likely to have children under 9 years old. There are fewer children in their teenage years, as many soldiers may transfer to a different base or transition to civilian life and move away as their children enter their teenage years. The ratio of children to teenagers is especially wide in Watertown. This disparity between Watertown and Jefferson County as a whole may also be explained by the tendency of honorably discharged soldiers who remain in the region to live outside of the City and perceptions among families that the Watertown School District is not as competitive. These perceptions may prompt families to choose a district outside of the city for their child's middle and high school years.

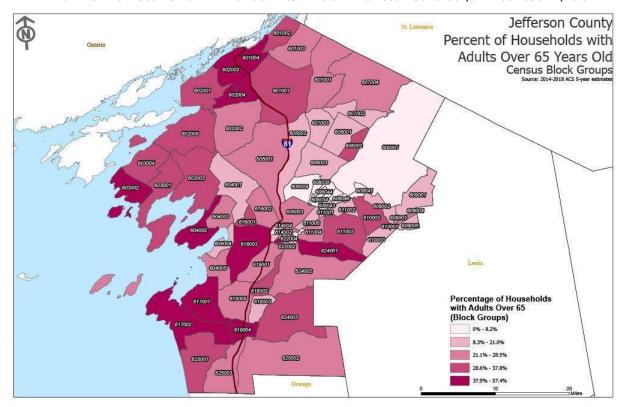
FIGURE 5: POPULATION PYRAMID, WATERTOWN, 2018



SOURCE: 2018 5-YEAR ACS DATA.

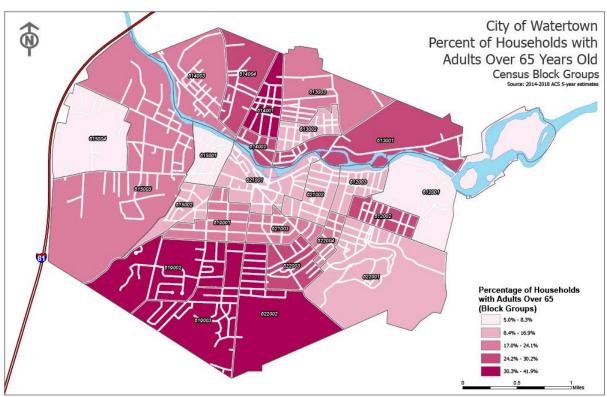
The senior population is not evenly distributed throughout the County or City. Map 6 illustrates that the population surrounding Fort Drum is younger with a low percentage of seniors, communities along the coast of Lake Ontario are more likely to have a higher proportion of seniors, likely retirees that have moved to live along the St. Lawrence River or Lake Ontario. Map 7 shows that within Watertown, seniors are more likely to live in the South of the City, due to the location of multiple senior living facilities. Very few seniors live in the Downtown, Sand Flats, and Ohio neighborhoods of Watertown.

MAP 6: PERCENT OF HOUSEHOLDS WITH ADULTS OVER 65 YEARS OLD BY CENSUS BLOCK GROUP, JEFFERSON COUNTY, 2018



SOURCE: 2018 5-YEAR ACS DATA.

MAP 7: PERCENT OF HOUSEHOLDS WITH ADULTS OVER 65 YEARS OLD BY CENSUS TRACT, WATERTOWN, 2018



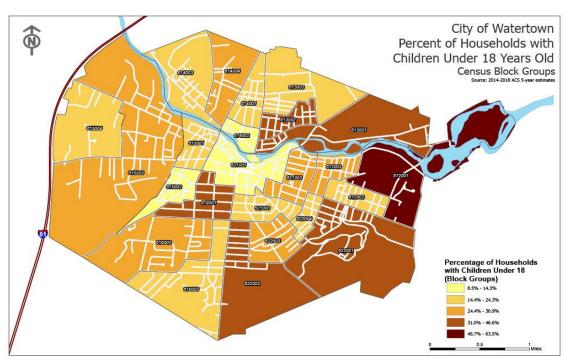
SOURCE: 2018 5-YEAR ACS DATA.

Within Jefferson County, households with children are concentrated in communities on the edge of Fort Drum, while communities in the Thousand Islands region are less likely to have children, as shown by Map 8. Within Watertown, neighborhoods with a greater percentage of households with children are more likely to be found in the outer ring of the City, especially on the East side in the Ohio neighborhood, as shown by Map 8. Census tract 12, block group 1 (012001) in this neighborhood is almost entirely large, multifamily apartment complexes including a Watertown Housing Authority Property.

Jefferson County Percent of Households with Children Under 18 Years Old Census Block Groups 607000 601001 607002 607003 606001 605000 616002 Percentage of Households 618003 with Children Under 18 (Block Groups) 6920000 0% - 14.5% 45.1% - 65.7% 65.8% - 100%

MAP 8: PERCENT OF HOUSEHOLDS WITH CHILDREN UNDER 18 YEARS OLD BY CENSUS BLOCK GROUP, JEFFERSON COUNTY, 2018

SOURCE: 2018 5-YEAR ACS DATA.



MAP 9: PERCENT OF HOUSEHOLDS WITH CHILDREN UNDER 18 YEARS OLD BY CENSUS TRACT, WATERTOWN, 2018

Source: 2018 5-Year ACS Data.

Overall, the City of Watertown has a large percentage of individuals with disabilities when compared to Jefferson County, New York State, and the United States. As Figure 6 shows, 17.6 percent of Watertown's population have a disability, 5 percent higher than the national average of 12.6 percent. Figure 7 identifies the percentage of population with each type of disability, with most common types of disabilities in Watertown and Jefferson County being ambulatory, independent living, and cognitive difficulties. This makes the need for adequate accessible and supportive housing especially important.

% Population With a Disability, 2018 20.0% 17.6% 18.0% 16.0% 14.2% 14.0% 12.6% 11 5% 12.0% 10.0% 8.0% 6.0% 4.0% 2.0% 0.0% United States New York Jefferson County Watertown

FIGURE 6: PERCENT POPULATION WITH A DISABILITY, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES

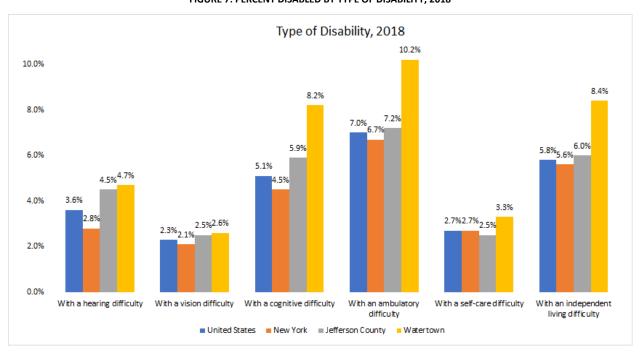


FIGURE 7: PERCENT DISABLED BY TYPE OF DISABILITY, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.

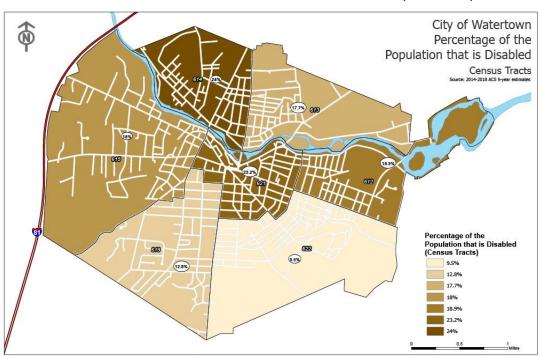
Map 10 illustrates that a higher percentage of the population is disabled on the Fort Drum base, likely due to the presence of disabled military personnel. Individuals with disabilities are also concentrated in the City of Watertown compared to the surrounding County. However, disparities in the percentage of the population with

a disability exist between Watertown neighborhoods as well. Twenty-four percent of residents in census tract 614 (Northside) are disabled, compared to only 9.5 percent residents in census tract 622 in the Knickerbocker neighborhood. There is also a concentration of disabled residents Downtown, where there is also a significant amount of subsidized housing.

Jefferson County Percentage of the Population that is Disabled Census Block Groups 14.3% 601 607 10.7% 608 11.2% 18.9% 16.7% 18.7% 13.6% Percentage of the Population that is Disabled (Block Groups) 4.4% - 11.7% 623 11.7% 24.1% - 100%

MAP 10: PERCENTAGE OF THE POPULATION THAT IS DISABLED BY CENSUS BLACK GROUP, JEFFERSON COUNTY, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.



MAP 11: PERCENTAGE OF THE POPULATION THAT IS DISABLED BY CENSUS TRACT, WATERTOWN, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.

ACCESS TO COMMUNITY ASSETS

In the City of Watertown, there are some disparities in access to community assets geographically and for members of protected classes. To better assess these disparities, CNY Fair Housing analyzed local economic and educational trends.

ECONOMIC OPPORTUNITY

Economic activity in Jefferson County is largely tied to Fort Drum, the largest single-site employer in New York State. As with many other urban centers nationwide, the City of Watertown has a lower median income and higher poverty rate than the surrounding communities. Figure 8 demonstrates that Watertown's median household income is 21 percent less than Jefferson County's median household income. Figure 9 shows that Jefferson County's household median income is gradually rising, following New York State's overall trends.

Median Household Income, 2018 \$70,000 \$65,323 \$60,293 \$60,000 \$52,268 \$50,000 \$41,339 \$40,000 \$30,000 \$20,000 \$10,000 United States New York Jefferson County Watertown

FIGURE 8: MEDIAN HOUSEHOLD INCOME, UNITED STATES, NEW YORK, JEFFERSON COUNTY & WATERTOWN, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.

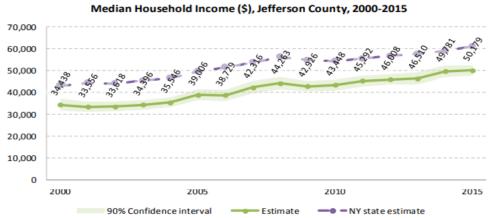


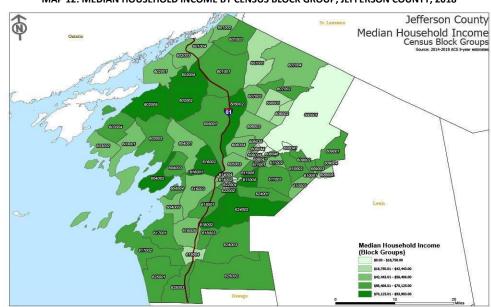
FIGURE 9: MEDIAN HOUSEHOLD INCOME, JEFFERSON COUNTY, 2000-2015

SOURCE: "JEFFERSON COUNTY PROFILE, 2017" CORNELL PROGRAM ON APPLIED DEMOGRAPHICS.

¹² "2019 Comprehensive Plan: City of Watertown, New York," City of Watertown.

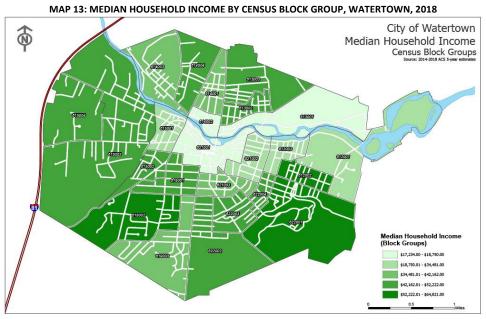
There are significant geographic differences in median income within Jefferson County and Watertown. Map 12 illustrates that median household incomes are lower within the City of Watertown and in the Fort Drum area, while median incomes are generally higher in the Thousand Islands region. The lower median income in the Fort Drum area may be attributed to the fact that young and new soldiers often receive less in direct income but are given a Basic Allowance for housing and living expenses that is not included in household income figures.

Map 13 demonstrates that within the City of Watertown, median income is the lowest in the center of the City, with census block groups with a median household income of \$18,750 or lower. This concentration of poverty may be an unintended consequence of apartment income limits, as Downtown has many older buildings that have been rehabilitated using federal and state grant funding and must remain affordable for a certain number of years. Census blocks in the highest quintile of median household income are more likely to be found in the outer ring neighborhoods of the City.



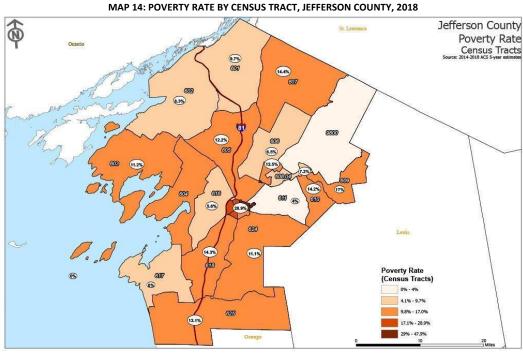
MAP 12: MEDIAN HOUSEHOLD INCOME BY CENSUS BLOCK GROUP, JEFFERSON COUNTY, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.

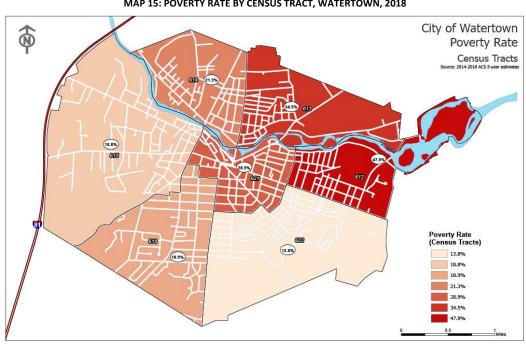


SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.

Similar geographic patterns are present in poverty rates as well. Map 14 demonstrates that all Jefferson County census tracts in the highest quintile of poverty rates are located in Watertown, while poverty levels are especially low on the Fort Drum base. Within Watertown, the poverty rate is the lowest (13.8 percent) in census tract 622 in the Knickerbocker neighborhood of the City, which also had the highest median income. However, the neighboring census tract in the Ohio neighborhood has the highest proportion of the population living in poverty, with 47.9 percent of residents below the poverty line. High levels of poverty are also found in the northeast and Downtown areas as well, which also have lower median incomes and subsidized housing communities with income requirements, as discussed above.



SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.



MAP 15: POVERTY RATE BY CENSUS TRACT, WATERTOWN, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.

Poverty rates for people of color are higher at both the City and County level, and there are large disparities between geographic regions as well. Figure 10 shows that more than half (51.7 percent) of Hispanic or Latino residents live below the poverty line in Watertown, compared to 22 percent county-wide. Additionally, 34.8 percent of Black or African American residents live in poverty in the City, compared to only 18.6 percent county-wide. However, the poverty rate for all people of color in Jefferson County is significantly higher than the white, non-Hispanic poverty rate of 13.0 percent. As is the case in much of the country, this is a direct result of decades of systemic racism and disinvestment.

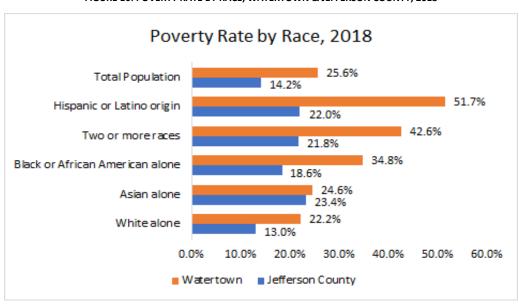


FIGURE 10: POVERTY RATE BY RACE, WATERTOWN & JEFFERSON COUNTY, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES

Table 2 below lists the major employers in Jefferson County in 2019. Fort Drum employed 19,000 County residents, about 7.5 times larger than the second largest employer, the Samaritan Medical Center. Other notable employers are the state and local governments and manufacturing, including New York Air Brake Corporation. Figure 11 shows Fort Drum employment patterns from 1988 to 2019, with a large increase corresponding to the Iraq and Afghanistan wars and substantial decline due to sequestration. In April 2019, Watertown call center Convergeys also closed and 244 workers lost their jobs. Figure 12 illustrates the base's economic impact over time, exceeding \$1.3 billion in 2019. This is an 8.4 percent decrease from 2018 due to a decrease in construction. Fort Drum's cumulative investment to date is \$27 billion.

¹³ "Comprehensive Housing Analysis: Watertown Housing Market and Vacant and Distressed Housing Concerns," GAR Associates, January 25, 2017, https://www.watertown-ny.gov/DocumentView.asp?DID=1422.

¹⁴ Fernando Narro, "Watertown call center shutting down: Hundreds laid off," NCPR, April 18, 2019, https://www.northcountrypublicradio.org/news/story/38481/20190418/watertown-call-center-shutting-down-hundreds-laid-off.

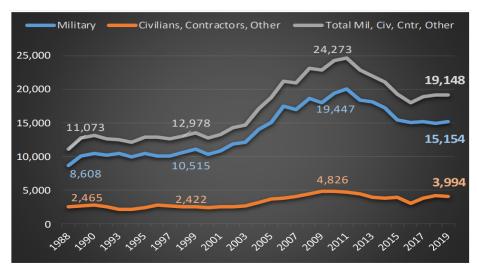
¹⁵ "Fiscal Year 2019 Fort Drum Economic Impact Statement," 10th Mountain Division Plans, Analysis, and Integration Office, 2019, https://home.army.mil/drum/application/files/9515/8565/8667/2019_Fort_Drum_EIS.pdf.

TABLE 2: MAJOR EMPLOYERS, JEFFERSON COUNTY, 2019

Major Employers - Jefferson County							
Company	Туре	# of Employees					
Fort Drum (Soldiers)	U.S. Army	14,996					
Fort Drum (Civilian)	U.S. Army	4,048					
Samaritan Medical Center	Healthcare	2,455					
New York State	Government	1,900					
County of Jefferson	Government	830					
Jefferson Rehabilitation Center	Healthcare	548					
Jeff-Lewis BOCES	Education	500					
New York Air Brake Corp.	Manufacturing	355					
City of Watertown	Government	367					
Carthage Area Hospital	Healthcare	384					
Jefferson Community College	Education	273					
Watertown Family YMCA	Recreation	239					
Johnson Newspaper Corp	Publishing	246					
National Grid	Utility	200					
Timeless Frames	Manufacturing	190					
HP HOOD	Manufacturing	150					
Purcell Construction	Construction	140					
River Hospital	Healthcare	134					
Knowlton Technologies	Manufacturing	130					

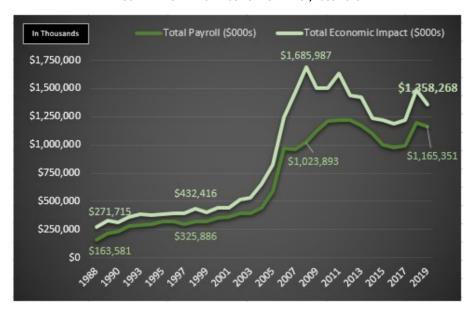
SOURCE: <u>HTTPS://www.jcida.com/Data-Demographics/Major-Employers-List.aspx.</u>

FIGURE 11: FORT DRUM EMPLOYMENT, 1988-2019



SOURCE: FISCAL YEAR 2019 FORT DRUM ECONOMIC IMPACT STATEMENT.

FIGURE 12: FORT DRUM ECONOMIC IMPACT, 1988-2019



SOURCE: FISCAL YEAR 2019 FORT DRUM ECONOMIC IMPACT STATEMENT.

Fort Drum's large economic impact and size fluctuations make it important for Jefferson County to invest in additional industries to reduce its economic reliance on U.S. defense spending. If Fort Drum were to experience deep cuts, the impacts would echo across other sectors, especially the housing market. The healthcare industry would likely lose jobs, demand for construction and commercial air travel would decrease, and enrollment in local school districts would decline. The effects of troop deactivation have already been seen in the housing market, with rising vacancy rates in Watertown contributing to destabilizing neighborhoods. These impacts would be especially felt in the Indian River and Carthage School Districts, but in Watertown and the surrounding communities as well.

A 2018 survey conducted by the Center for Community Studies at Jefferson Community College found that local residents are concerned with the local economy and availability of good jobs. ¹⁷ Two industries in Watertown that have been identified as specialized sectors for potential growth are paper manufacturing and transportation equipment manufacturing. ¹⁸ Additionally, the City of Watertown was awarded \$10 million in 2017 as part of the New York State Downtown Revitalization Initiative (DRI), which the City plans to use to transform downtown and attract future employers. ¹⁹

There is also a lack of four-year higher education institutions in the County, which both hinders workforce development and potential job opportunities. SUNY Jefferson is an excellent two-year school that additionally also offers some Bachelor's and Master's degrees in coordination with seven partner universities located in other parts of New York State.^{20, 21} However, as of spring 2020, Jefferson Community College had a declining enrollment of

 $^{^{16}}$ "Consolidated Plan – Program Years 2016 – 2020," City of Watertown Planning Office.

¹⁷ "Comprehensive Plan: Watertown, New York," City of Watertown.

¹⁸ "Consolidated Plan – Program Years 2016 – 2020," City of Watertown Planning Office.

¹⁹ "Comprehensive Plan: Watertown, New York," City of Watertown.

²⁰ Ihid

²¹ "Bachelor and Graduate Degrees," Jefferson Community College, https://sunyjefferson.edu/academics/programs/bachelors-masters-degrees.php.

3,400 students, which is expected to continue decreasing with the COVID-19 pandemic.^{22,23} According to the 2016-2020 Consolidated Plan, only 28.5 percent of the City of Watertown's labor force has a Bachelor's degree or higher, while 36.6 percent of the labor force had a high school degree or less. This means many employers, especially hospitals, must attract employees from other regions. This is a large challenge and employers have emphasized the difficulty in recruiting employees to move to Northern New York without an existing tie to the area.

TRANSPORTATION

Interstate 81 runs adjacent to Watertown, connecting the City to Syracuse and the Canadian border. Unlike many other Upstate cities, interstate highways were routed outside of the City, leaving original neighborhoods and communities intact.²⁴

Within the City, many families have limited access to a vehicle. 18.5 percent of Watertown households do not have access to a car, compared to only 8.9 percent of Jefferson County households.²⁵ The Watertown CitiBus system, operated by the City's Department of Public Works, provides bus service within the City limits. Map 15 depicts the bus routes. Within the City limits, bus service is within a quarter of a mile to 86 percent of city addresses.²⁶ However, buses run infrequently, services end early, and there is no Sunday service, limiting transportation access to those without vehicles.²⁷ The 2019 Comprehensive Plan states that residents are interested in expanding Citibus service. Uber service in the City tends to be expensive and is not a viable long-term option for families.

The Adirondack Trailways bus service provides bus service throughout New York State. The Adirondack Trailways Bus Terminal was recently moved from within the City of Watertown to the Seaway Plaza in the town of Pamelia, just outside of the city border. Citibus route C-1, shown below, makes bus transfer to Adirondack Trailways possible. Additionally, Jefferson County owns and operates the Watertown International Airport, located in the Town of Hounsfield, although service is limited to two commercial flights to Philadelphia International Airport daily.

^{2.}

²² "Comprehensive Housing Analysis: Watertown Housing Market and Vacant and Distressed Housing Concerns," GAR Associates.

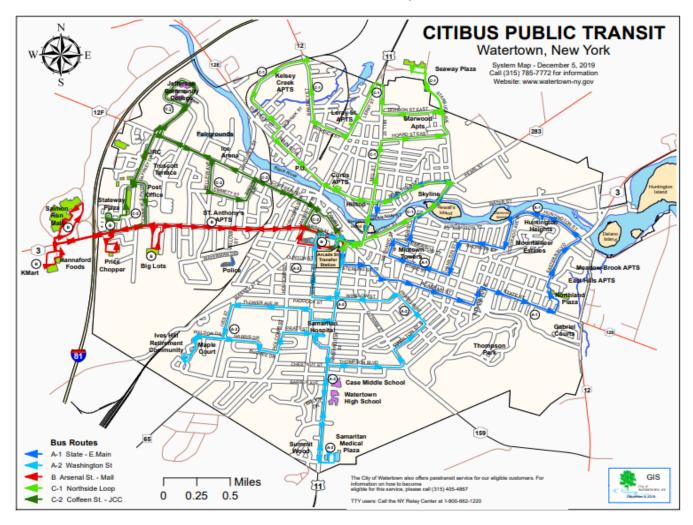
Amy Feiereisel, "How North Country college admissions are being turned upside down by COVID-19," North Country Public Radio, April 29, 2020, https://www.northcountrypublicradio.org/news/story/41269/20200429/how-north-country-college-admissions-are-being-turned-upside-down-by-covid-19.

²⁴ "Analysis of Impediments to Fair Housing: City of Watertown, NY, 2015," City of Watertown Office of Planning and Community Development, 2015.

²⁵ 2018 5-Year ACS Data.

²⁶ "Analysis of Impediments to Fair Housing: City of Watertown, NY, 2015," City of Watertown Office of Planning and Community Development.

²⁷ "Watertown CitiBus Schedule 2020," City of Watertown, 2020, https://www.watertown-ny.gov/DocumentView.asp?DID=1082.



SOURCE: CITY OF WATERTOWN, <u>HTTPS://www.watertown-ny.gov/index.asp?NID=138</u>.

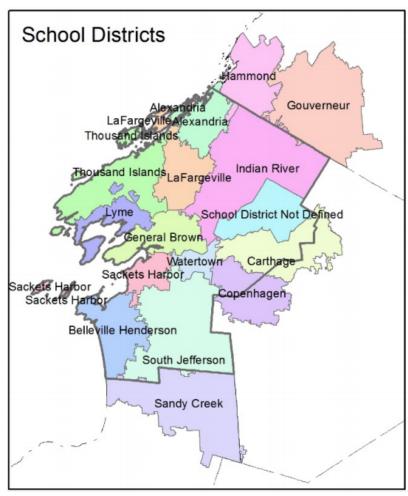
EDUCATIONAL OUTCOMES

There are 17,062 total K-12 public school students in Jefferson County throughout 11 school districts as shown in Map 17.²⁸ The blue area labeled "School District Not Defined" is Fort Drum, and children who live in on-post housing are divided between the Indian River and Carthage school districts. As shown by the population pyramids, both Jefferson County and Watertown have an especially large number of children under nine years old, as many soldiers stationed at Fort Drum may have younger children. The largest school district in Jefferson County is Watertown City School District with 3,977 students, followed by Indian River (3,685) and Carthage (3,110). The smallest school district is Lyme, with only 330 K-12 students.

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²⁸ "Jefferson County at a Glance," NYSED, 2020, https://data.nysed.gov/profile.php?county=022.

MAP 17: JEFFERSON COUNTY SCHOOL DISTRICTS



SOURCE: "JEFFERSON COUNTY PROFILE, 2017" CORNELL PROGRAM ON APPLIED DEMOGRAPHICS.

Table 3 below shows the racial and ethnic composition of school districts that are predominantly located in Jefferson County. Generally, the largest districts are the most diverse. Indian River has the highest proportion of Black or African American students (9 percent) and Hispanic or Latino Students (15 percent) but is still predominantly white (66 percent). Watertown and Carthage are also significantly more diverse than the other, smaller Jefferson County school districts, the remaining of which all are at least 90 percent white.

TABLE 3: RACE AND ETHNICITY OF STUDENTS, JEFFERSON COUNTY SCHOOL DISTRICTS, 2018-2019

	Wh	nite		African- rican	or Ala	n Indian askian tive		Racial	Hawaiia	r Native n/ Other Islander	Hispa Lat	nic or tino
School District	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Alexandria (n=480)	454	95%	6	1%	2	0%	8	2%	0	0%	10	2%
Belleville-Henderson (n=453)	413	91%	5	1%	0	0%	15	3%	3	1%	17	4%
Carthage (n=3,110)	2,347	75%	167	5%	16	1%	222	7%	41	1%	317	10%
General Brown (n=1,400)	1,318	94%	22	2%	4	0%	19	1%	11	1%	26	2%
Indian River (n=3,685)	2,430	66%	342	9%	20	1%	232	6%	91	2%	570	15%
La Fargeville (n=504)	470	93%	2	0%	0	0%	40	4%	5	1%	7	1%
Lyme (n=330)	308	93%	4	1%	0	0%	6	2%	2	1%	10	3%
Sackets Harbor (n=432)	388	90%	3	1%	2	0%	15	3%	2	0%	22	5%
South Jefferson (n=1,807)	1,699	94%	14	1%	4	0%	48	3%	10	1%	32	2%
Thousand Islands (n=884)	808	91%	7	1%	7	1%	29	3%	2	0%	31	4%
Watertown (n=3,977)	2,768	70%	299	8%	20	1%	389	10%	81	2%	420	11%

SOURCE: 2018-2019 NYSED DATA.

Table 4 shows that the impact of Fort Drum is especially evident at Indian River and Carthage Central Schools, where 58 percent and 43 percent of students have parents in the armed forces, respectively. Both Indian River and Carthage school district boundaries include federal land exempt from local property taxes. This loss of local revenue for the school districts is mitigated by federal aid.²⁹ Tri-county schools receive over \$44 million in Department of Defense Impact Aid, 99.9 percent of which is spent in Jefferson County.

56 percent of Jefferson County public school students are economically disadvantaged. In the Watertown City School District, 74 percent of students are economically disadvantaged, followed by 60 percent at La Fargeville. The smallest proportion (32 percent) of students are economically disadvantaged at General Brown. Watertown also has the lowest graduation rate of 70 percent, followed by 78 percent at Belleville-Henderson. Four districts have graduation rates over 90 percent, the highest of which being 96 percent at Alexandria Central School District.

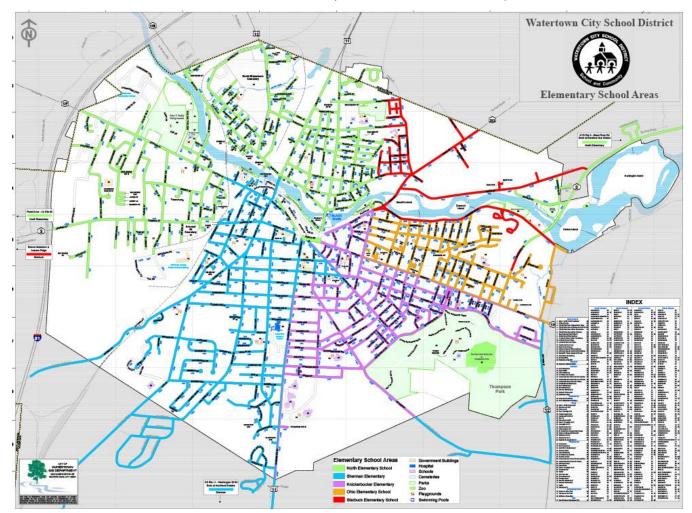
TABLE 4: SELECTED CHARACTERISTICS, WATERTOWN CITY SCHOOL DISTRICT ELEMENTARY SCHOOLS, 2018-2019

Selected Characteristics, Jefferson County School Districts, 2018-2019 School Year								
School District	% Parents in the Armed Forces	% Economic Disadvantaged	Graduation Rate					
Alexandria (n=480)	-	49%	96%					
Belleville-Henderson (n=453)	-	57%	78%					
Carthage (n=3,110)	43%	53%	89%					
General Brown (n=1,400)	-	32%	89%					
Indian River (n=3,685)	58%	55%	91%					
La Fargeville (n=504)	5%	60%	89%					
Lyme (n=330)	5%	51%	84%					
Sackets Harbor (n=432)	10%	42%	91%					
South Jefferson (n=1,807)	2%	51%	82%					
Thousand Islands (n=884)	2%	50%	92%					
Watertown (n=3,977)	8%	74%	70%					

Source: 2018-2019 NYSED Data.

²⁹ "Fiscal Year 2019 Fort Drum Economic Impact Statement," 10th Mountain Division Plans, Analysis, and Integration Office.

Within the Watertown School District, there are five elementary schools, one intermediate school (5th & 6th grade), one middle school (7th & 8th Grade), and one high school. Map 18 shows the areas for the five elementary schools.



MAP 18: ELEMENTARY SCHOOL AREAS, WATERTOWN CITY SCHOOL DISTRICT, 2020

Table 5 shows the racial composition of the five Watertown City School District Elementary Schools. There are some levels of racial segregation between elementary schools, but a larger pattern of economic segregation. The most diverse elementary school is Starbuck School in the northeast corner, with 62 percent white students, 11 percent Black, 15 percent multi-racial, and 11 percent Hispanic or Latino students. The Sherman School, serving the southwest area of the City, is the least diverse elementary school, with 74 percent white and only 3 percent Black students. This is especially concerning as Table 6 demonstrates that the Sherman School also has the significantly least (53 percent) amount of economically disadvantaged students of the five elementary schools. The Sherman district primarily serves neighborhoods made up of single-family homes and few multifamily units or affordable properties. Three-quarters of students are economically disadvantaged in three Watertown elementary schools; Ohio Street School (80 percent), North Elementary School (77 percent), and Starbuck Elementary (76 percent). There is a larger amount of multifamily housing in all three of these districts.

TABLE 5: RACE OF STUDENTS, WATERTOWN CITY SCHOOL DISTRICT ELEMENTARY SCHOOLS, 2018-2019

	W	nite	Black or African- American		Multi-Racial		Asian or Native Hawaiian/ Other Pacific Islander		Hispanic or Latino	
School District	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
North Elementary School (n =495)	323	65%	46	9%	63	13%	5	1%	56	11%
Knickerbocker School (n=376)	270	72%	19	5%	49	13%	4	1%	34	9%
Ohio Street School (n=367)	232	63%	28	8%	42	11%	3	1%	59	16%
Sherman School (n =318)	236	74%	8	3%	35	11%	10	3%	28	9%
Starbuck Elementary (n=198)	123	62%	22	11%	29	15%	2	1%	21	11%

SOURCE: 2018-2019 NYSED DATA.

TABLE 6: SELECTED CHARACTERISTICS, WATERTOWN CITY SCHOOL DISTRICT ELEMENTARY SCHOOLS, 2018-2019

Selected Characteristics, Watertown City School District Elementary Schools, 2018-2019 School Year						
% Students % Economic School District with Disadvanta Disabilities ed						
North Elementary School (n=495)	18%	77%				
Knickerbocker School (n=376)	17%	67%				
Ohio Street School (n=367)	16%	80%				
Sherman School (n=318)	13%	53%				
Starbuck Elementary (n=198)	12%	76%				

SOURCE: 2018-2019 NYSED DATA.

HOUSING OPPORTUNITY

Several factors affect housing choice for members of protected classes within the City of Watertown. These include the age of housing stock, high levels of vacancy, and housing market trends related to Fort Drum. Both homeowners and renters are leaving the City of Watertown for new housing in the surrounding towns or on the Fort Drum base.³⁰ This is likely partially driven by the reputation of old, substandard homes in Watertown. Although there has been an increase in housing development in Jefferson County, there is still a need for quality affordable housing units in the City. However, due to high vacancy rates, efforts should focus on stabilization and rehabilitating existing homes rather than new development.

In the City's first six years as a CDBG entitlement community, Watertown has completed several infrastructure improvements including sidewalk construction projects and the replacement of ADA ramps, administered several successful owner-occupied and rental housing rehabilitation programs, assisted with the rehabilitation of two large multi-family, affordable housing developments, assisted first-time homebuyers with the purchase of a new home, worked to stop the spread of blight by demolishing a number of blighted properties, and has implemented several public service programs and projects. However, the challenges of accessibility, vacancy, and a shortage of affordable homes persist.

Housing Tenure

There are strong geographic and racial and ethnic disparities in homeownership rates for Watertown and Jefferson County. Figures 13 and 14 show that Watertown has a homeownership rate of only 40.2 percent, while Jefferson County has a homeownership rate of 55.7 percent. It is unsurprising that both the City and County have a higher proportion of renters than the national average, as the region has a more transient population due to Fort Drum.

³⁰ "Comprehensive Housing Analysis: Watertown Housing Market and Vacant and Distressed Housing Concerns," GAR Associates.

Additionally, Watertown has experienced a large shift toward renting since 2009.³¹ There are significantly lower rates of housing instability among Watertown homeowners. Only around 10 percent of homeowners move annually, compared to 50-to-60 percent of renters.³²

Only 94 percent of Jefferson County residents live in households.³³ The remaining 6 percent, around 6,700 people, live in group quarters. This includes Fort Drum soldiers living in barracks, SUNY Jefferson students living in dormitories, incarcerated people in the state prison located between Clayton and Cape Vincent, and people in assisted living and community residential facilities.

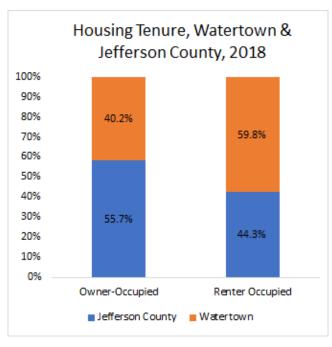


FIGURE 13: HOUSING TENURE, WATERTOWN & JEFFERSON COUNTY, 2018

SOURCE: 2018 5-YEAR ACS ESTIMATES.

Map 19 illustrates that census block groups with the lowest levels of homeownership are located near Fort Drum, due to the more transient military population, and in the City of Watertown. Block groups with the highest level of owner-occupancy are generally located in the outer ring of the County. Map 20 depicts that within the City of Watertown, the census block groups with the lowest levels of owner occupancy are largely found Downtown, as well as two block groups in the Sand Flats and Ohio neighborhoods. Apartments in Downtown Watertown tend to be older, rehabilitated buildings, while apartments in the rest of the City are largely garden-style complexes, a style that was popular when the 10th Mountain Division was garrisoned to the region.

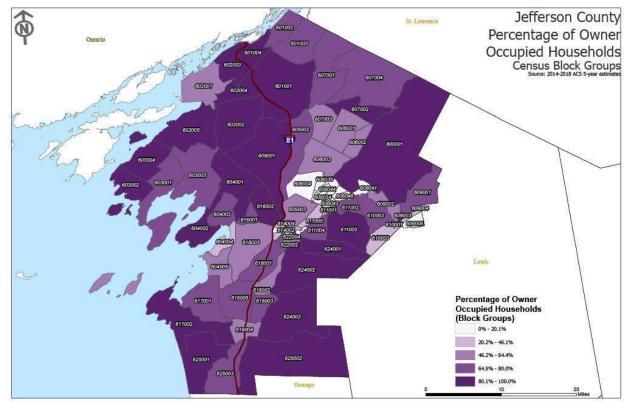
Levels of owner-occupancy in Watertown are largely determined by the available housing stock. The Sherman, Knickerbocker, and parts of the North Side are primarily zoned as single-family neighborhoods. As the City of Watertown overhauls its Zoning Ordinance from use-based to form-based zoning, this is an opportunity to influence future development and foster the creation of more mixed-use properties throughout the City while preserving existing neighborhoods. The current zoning ordinance dates to 1959.

³¹ "Comprehensive Housing Analysis: Watertown Housing Market and Vacant and Distressed Housing Concerns," GAR Associates.

³² Ibid.

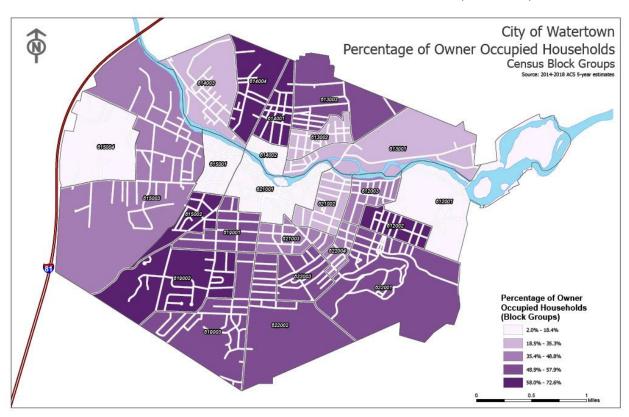
³³ "Jefferson County, New York: Community Health Assessment and Community Health Improvement Plan, 2019-2021," Jefferson County Public Health Service, 2019, https://co.jefferson.ny.us/media/Public%20Health/2019%202021%20JC%20CHA%20CHIP.pdf.

MAP 19: PERCENTAGE OF OWNER OCCUPIED HOUSEHOLDS BY CENSUS BLOCK GROUP, JEFFERSON COUNTY, 2018



SOURCE: 2018 5-YEAR ACS ESTIMATES.

MAP 20: PERCENTAGE OF OWNER OCCUPIED HOUSEHOLDS BY CENSUS BLOCK GROUPS, WATERTOWN, 2018



SOURCE: 2018 5-YEAR ACS ESTIMATES.

In addition to the geographic disparities in homeownership across Watertown and Jefferson County, there is a stark disparity in homeownership by race and ethnicity in both geographic areas. As Figure 14 highlights, the white homeownership rate in both Watertown and Jefferson County is higher than that of every other racial and ethnic group, except for American Indian and Alaska Natives in Watertown. In Watertown, there is an especially low homeownership rate of only 3.5 percent for Asian residents. In Jefferson County, the homeownership rate for white, non-Hispanic households is over six times the abysmally low homeownership rate of 9 percent for Black households. The Hispanic or Latino homeownership rate in Jefferson County is less than a third of that of white, non-Hispanic households as well. These disparities are likely attributable in part to the fact that much of the non-white and Hispanic population in the County are transient military personnel.

Homeownership as a % of Total Occupied Housing Units by Race, Watertown & Jefferson County, 2018 40.2% County Population 55.7% White 61.7% 54 2% American Indian and Alaska Native Asian 25.8% 22.0% Two or more races 20.5% ■ Watertown Homeownership Rate Hispanic or Latino ■ Jefferson County Homeownership Rate Some other race 15.1% 14.3% Black or African American 0.0% 20.0% 40.0% 60.0% 80.0%

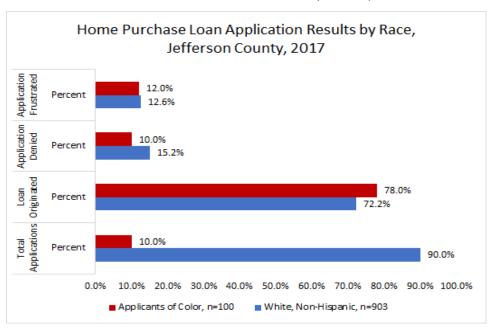
FIGURE 14: HOMEOWNERSHIP AS A PERCENTAGE OF TOTAL OCCUPIED HOUSING UNITS BY RACE, WATERTOWN & JEFFERSON COUNTY, 2018

SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.

To better understand disparities in homeownership rates, CNY Fair Housing analyzed 2017 Home Mortgage Disclosure Act (HMDA) data for Jefferson County. Figure 15 below identifies home purchase loan applications by race and ethnicity within the County. Applicants of color (10.0 percent), especially Black applicants, are underrepresented among home mortgage applicants as compared to their proportion of the County population (18.2 percent), while white mortgage applicants (90.0 percent) are overrepresented relative to their proportion of the County population (81.2 percent). This is especially concerning when considering the already low homeownership rates of Black households. Applicants of color that do apply have their loans originated at a similar rate to white applicants, however, given the low number of applicants, it is difficult to draw statistically significant conclusions.

The maps below illustrate that the highest number of home purchase loan applications are submitted in census tracts surrounding Fort Drum. There are similar spatial patterns of the number of originated home purchase loans. Although there are generally fewer home purchase loan applications in the City of Watertown, the Sherman neighborhood is in the top quintile of originated home purchase loans.

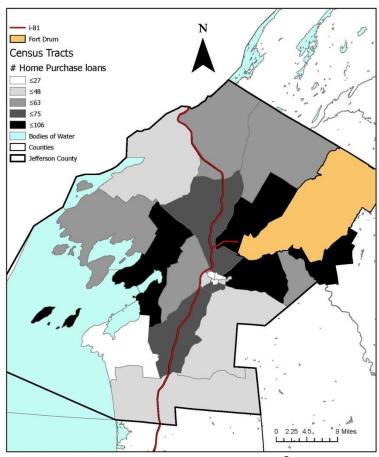
FIGURE 15: 2017 HOME PURCHASE LOAN APPLICATIONS BY RACE/ETHNICITY, JEFFERSON COUNTY



Source: 2017 HMDA data for owner-occupied as a principal dwelling home purchase applications. Excludes loans purchased by financial institutions and applications with applicant race unknown.

MAP 21: NUMBER OF HOME PURCHASE LOAN APPLICATIONS, JEFFERSON COUNTY, 2017

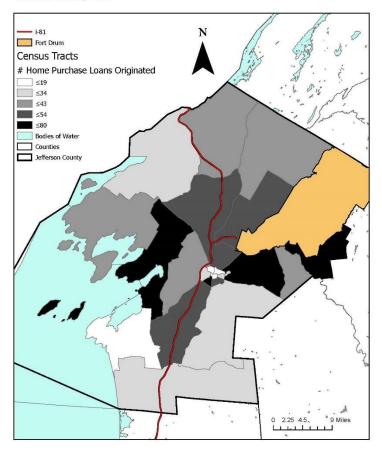
Number of Home Purchase Loan Applications, Jefferson County Census Tracts, 2017



Source: 2017 HMDA data for owner-occupied as a principal dwelling home purchase applications. Excludes loans purchased by financial institutions and applications with applicant race unknown. Map created by CNY Fair Housing.

MAP 22: NUMBER OF ORIGINATED HOME PURCHASE LOANS, JEFFERSON COUNTY, 2017

Number of Originated Home Purchase Loans, Jefferson County Census Tracts, 2017

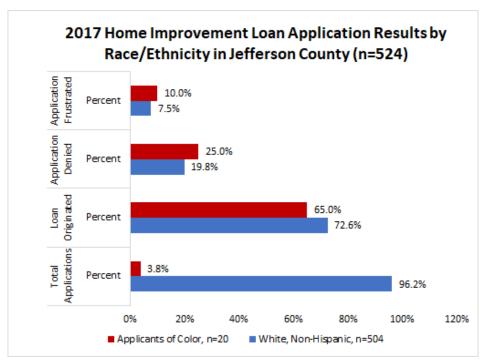


SOURCE: 2017 HMDA DATA FOR OWNER-OCCUPIED AS A PRINCIPAL DWELLING HOME PURCHASE APPLICATIONS. EXCLUDES LOANS PURCHASED BY FINANCIAL INSTITUTIONS AND APPLICATIONS WITH APPLICANT RACE UNKNOWN. MAP CREATED BY CNY FAIR HOUSING.

Disparities between racial groups are even more stark for home improvement loan applications. Only 3.8 percent of home improvement loan applicants in Jefferson County were applicants of color, amounting to just 20 applicants. Ultimately, only 13 applicants of color had home improvement loans originated in 2017. Although white applicants had loans originated at a higher rate than applicants of color, the low number of measurable population again makes it difficult to draw statistically significant conclusions on this data.

Additionally, there are geographic disparities between home improvement loan applications. All census tracts in the lowest quartile of home improvement applications were located within the City of Watertown. This is especially concerning due to Watertown's old housing stock and its implications for contributing to vacancy and zombie properties. Additionally, more loans were originated in Jefferson County's outer census tracts than within the City.

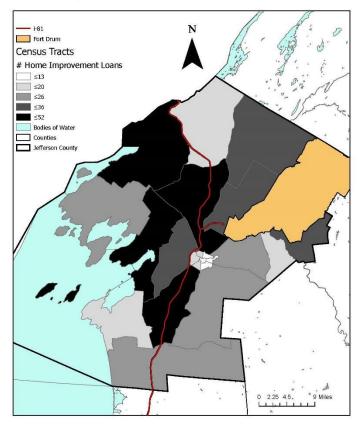
FIGURE 16: 2017 HOME LOAN APPLICANTS BY RACE/ETHNICITY, JEFFERSON COUNTY



Source: 2017 HMDA data for owner-occupied as a principal dwelling home purchase applications. Excludes loans purchased by financial institutions and applications with applicant race unknown.

MAP 23: NUMBER OF HOME IMPROVEMENT LOAN APPLICATIONS, JEFFERSON COUNTY, 2017

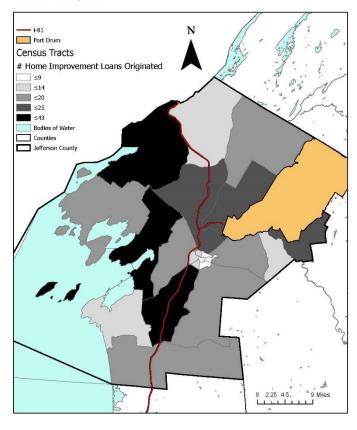
Number of Home Improvement Loan Applications, Jefferson County Census Tracts, 2017



SOURCE: 2017 HMDA DATA FOR OWNER-OCCUPIED AS A PRINCIPAL DWELLING HOME PURCHASE APPLICATIONS. EXCLUDES LOANS PURCHASED BY FINANCIAL INSTITUTIONS AND APPLICATIONS WITH APPLICANT RACE UNKNOWN. MAP CREATED BY CNY FAIR HOUSING.

MAP 24: NUMBER OF ORIGINATED HOME IMPROVEMENT LOANS, JEFFERSON COUNTY, 2017

Number of Originated Home Improvement Loans, Jefferson County Census Tracts, 2017



SOURCE: 2017 HMDA DATA FOR OWNER-OCCUPIED AS A PRINCIPAL DWELLING HOME PURCHASE APPLICATIONS. EXCLUDES LOANS PURCHASED BY FINANCIAL INSTITUTIONS AND APPLICATIONS WITH APPLICANT RACE UNKNOWN. MAP CREATED BY CNY FAIR HOUSING.

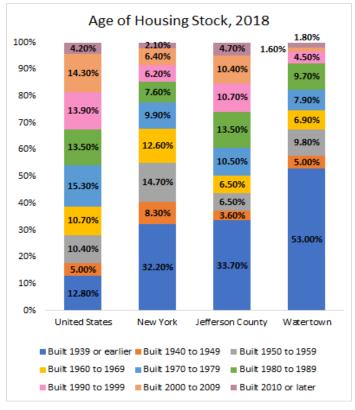
Neighbors of Watertown, Inc. works to stabilize neighborhoods and increase homeownership through their First Time Home Buyer Program, Homebuyer Education Program, and Buy / Rehab / Resell Housing Rehabilitation Program. The nonprofit also administers the county and city-wide Owner-Occupied and Rental Home Rehabilitation and First-Time Homebuyer Programs. The City of Watertown's Strategic Goals and Objectives (December 2019) states that the City of Watertown aims to continue promoting homeownership by allocating CDBG funds to provide homebuyer assistance for at least five low to moderate income families each year. The plan also states the City aims to partner with local nonprofits and Habitat for Humanity to develop volunteer programs to assist homeowners with minor repairs to help at least 15 homeowners a year.

Housing Quality

As an industrial city that has experienced decades of population decline, Watertown has an older housing stock and neighborhoods that suffer from high vacancy rates, with 15.8 percent of units vacant.³⁴ Figure 18 compares the age of Watertown's housing stock with the rest of Jefferson County, New York State, and the United States. 53 percent of homes in Watertown were built before the 1940s, compared to only 33.7 percent in Jefferson County. The difference in the amount of newer housing built in the last two decades is particularly stark. In Jefferson County, 15.1 percent of housing was built after 2000 while in the City of Watertown, just 3.4 percent of the housing was built since 2000. Additionally, older housing stock is not distributed evenly throughout Jefferson County, as the areas surrounding Fort Drum have newer homes than more rural towns. Map 13 shows that within Watertown, older homes are concentrated in the middle of the City while newer developments are on the outer ring. In recent years, newer housing development has occurred on Arsenal Street in Watertown and the towns of Watertown, LeRay, and Pamelia.

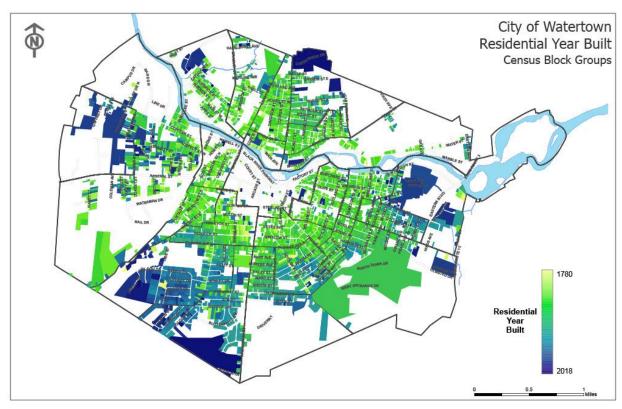
³⁴ Table DP04, ACS 2018 5-Year Data.

FIGURE 17: AGE OF HOUSING STOCK, UNITED STATES, NEW YORK, JEFFERSON COUNTY & WATERTOWN, 2018



SOURCE: 2018 5-YEAR ACS DATA.

MAP 25: RESIDENTIAL YEAR BUILT, 2018, WATERTOWN



SOURCE: 2018 5-YEAR ACS DATA.

Several factors relating to the age of the housing stock are of particular concern related to protected classes and fair housing concerns. First, most of the City's housing units, around 82 percent, were built prior to when the ban on the use of lead paint in homes was enacted. This means families with children in the City may face risk of lead exposure. In 2018, 175 (5.8 percent) of 3,007 screened children were lead poisoned.³⁵ This was a 35 percent decrease in the number of lead poisoned children from 2017.

Second, only a fraction of the housing units in the City were built after accessibility standards for multi-family housing were put in place in 1994, making it more difficult for people with mobility impairments to find suitable housing. In addition, older housing units tend to contain several features that make accessibility difficult such as second floors and narrow doorways. This is particularly important given the significant numbers of individuals with mobility impairments living in the City.

Lastly, older housing stock is more likely to be in poor condition. The 2016-2020 City of Watertown Consolidated Plan states that their rehabilitation programs revealed a great need for housing quality improvement. With the large amount of newer housing outside the City, area residents with means to move have a number of housing choices that do not have the difficulties that come with living in older housing.

Affordability

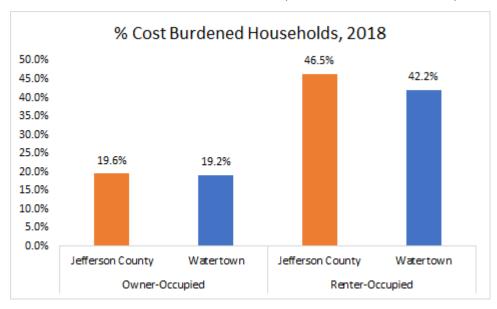
Fair housing and affordable housing are not one and the same, although there is a point at which the two may intersect. Affordable housing is the availability of housing which is suited to residents of modest or scant economic means. Public and subsidized housing fall into this category, as do certain programs or products which make home ownership affordable for lower-income families. Fair housing is the availability of housing on an equal basis, without regard to protected class.

Those who are protected by Fair Housing laws may utilize affordable housing and often do so at disproportionate rates. In some instances, affordable housing may be designed specifically for such protected classes, such as housing for the elderly or people with disabilities. However, though protected classes have a disproportionate need for affordable housing, the achievement of affordable housing does not ensure Fair Housing practices have been followed; nor does the achievement of Fair Housing, i.e., non-discrimination, mean that affordable housing needs have been realized. With this distinction in mind, protected classes disproportionate need for affordable housing warrants a look at how affordable housing policies have affected housing choice.

One measure of the need for affordable housing is the percentage of households that are housing cost burdened or severely housing cost burdened. Cost-burdened households refer to households that are paying more than 30 percent of their household income to housing costs while severely cost-burdened households are paying more than 50 percent of their household income to housing costs. For renters, this includes rent and utility costs while for homeowners this includes mortgage, utility, taxes, and insurance costs. Figure 19 shows the percentage of cost-burdened renter and owner households. As represented, a much higher proportion of renter households are cost-burdened, over 40 percent of renters in both Jefferson County and Watertown. Interestingly, Jefferson County has higher levels of cost burden than Watertown, despite having a higher median income.

³⁵ "2018 Annual Report," Jefferson County Public Health Service, https://co.jefferson.ny.us/media/Public%20Health/2018%20Annual%20Report.pdf.

FIGURE 18: PERCENTAGE OF COST-BURDENED HOUSEHOLDS, WATERTOWN & JEFFERSON COUNTY, 2018



SOURCE: 2018 5-YEAR ACS ESTIMATES.

One barrier to housing choice is the need for more quality, affordable rental housing, as shown above with the large proportion of cost-burdened renters. Although Watertown has relatively low housing costs, low-income households still may be unable to afford rent. According to the National Low Income Housing Coalition, Jefferson County residents earning minimum wage would have to work 54 hours a week to afford a one-bedroom apartment and 72 hours a week to afford a two-bedroom apartment without cost burden. Additionally, many low-wage workers who would like to work fulltime may not be scheduled for 40 hours a week, further exacerbating their cost burden. A Supplemental Security Income (SSI) recipient would only be able to afford rent at \$261 a month. High levels of cost-burden are also exacerbated by low supply and high demand for affordable rental housing. The Comprehensive Housing Analysis completed in Fall 2016 found that of the total 2,344 affordable rental housing units in Watertown, only 46 units were available.

Besides deployment and troop levels affecting patterns of supply and demand, the military presence also directly impacts housing affordability. Military personnel living off base receive a basic allowance for housing (BAH) in addition to their regular paycheck. This in turn raises the rent for the surrounding community and exacerbates the affordable housing shortage. The BAH also makes it more enticing for landlords to try and rent homes to soldiers as they can make a larger profit, limiting housing supply for non-military families. The impact of the BAH on rising rents was a large concern in the 2015 Analysis of Impediments and is still a challenge today.

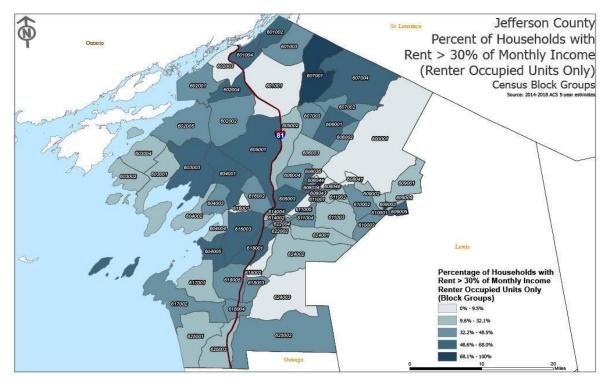
Map 22 illustrates that high levels of housing cost burden for renters is evenly distributed throughout the County and is not concentrated in the City. This emphasizes the need for more affordable housing county-wide. Map 23 shows that within Watertown, neighborhoods with high proportions of cost-burdened renters are found in the Northside and some Knickerbocker census tracts, while neighborhoods with lower levels of rental cost-burden are located in the Sand Flats and also some Knickerbocker census tracts.

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³⁶ "Out of Reach 2020: New York," National Low Income Housing Coalition, 2020, https://reports.nlihc.org/oor/new-york.

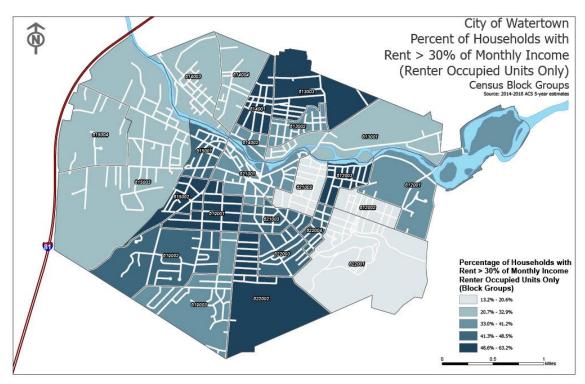
MAP 26: PERCENT OF HOUSEHOLDS WITH RENT GREATER THAN 30% OF MONTHLY INCOME OF RENTER OCCUPIED UNITS BY CENSUS BLOCK GROUP,

JEFFERSON COUNTY, 2018



SOURCE: 2014-2018 ACS 5-YEAR ESTIMATES.

MAP 27: PERCENT OF RENTER HOUSEHOLDS WITH RENT GREATER THAN 30% OF MONTHLY INCOME OF RENTER OCCUPIED UNITS BY CENSUS BLOCK GROUP, WATERTOWN, 2018



SOURCE: 2018 5-YEAR ACS ESTIMATES.

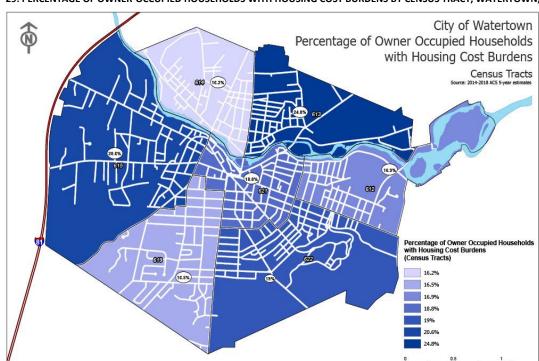
Map 28 finds that the highest levels of homeowner cost burden in Jefferson County are located on the Western edge of Fort Drum. Census tracts with lower levels of owner-occupied cost burden are found in the southern end of the County. Map 29 shows that the census tract with the highest level of homeowner cost burden (24.8 percent) in Watertown is found in the Northside of the City. However, it is important to note the levels of homeowner cost burden both County and City wide are much lower than levels of renter cost burden.

Jefferson County
Percentage of Owner Occupied
Households with Housing Cost Burdens
Census Tracts
Source 2014-2018 ACS Syser estimates

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MAP 28: PERCENTAGE OF OWNER-OCCUPIED HOUSEHOLDS WITH HOUSING COST BURDENS BY CENSUS TRACT, JEFFERSON COUNTY, 2018

Source: 2018 5-Year ACS Estimates.



MAP 29: PERCENTAGE OF OWNER-OCCUPIED HOUSEHOLDS WITH HOUSING COST BURDENS BY CENSUS TRACT, WATERTOWN, 2018

SOURCE: 2018 5-YEAR ACS ESTIMATES.

Subsidized Housing

As mentioned previously, members of protected classes have a disproportionate need for affordable housing due to factors such as lower household incomes and special housing needs. Therefore, subsidized housing programs are an important component in assessing the fair housing choices in the City. Table 8 below highlights characteristics of Watertown and Jefferson County households living in subsidized housing. Although Watertown is less than a quarter of Jefferson County's population, 71.2 percent of HUD subsidized units are concentrated within the City of Watertown. Similarly, 70.7 percent of LIHTC units with an active subsidy in Jefferson County are located within Watertown. Additionally, subsidized homes in Watertown are more likely to be in census tracts 612 and 621 with a higher level of poverty than Jefferson County as a whole. Countywide, families spend an average of 17 months on a waitlist for subsidized housing, showing the high demand for affordable housing.

TABLE 7: SUMMARY OF SUBSIDIZED HOUSING, WATERTOWN & JEFFERSON COUNTY, 2019

	#Units, Jefferson Co	# Units,	% County Units in	poverty (Census tract),	(Census	Average months on waiting list, Jeff Co
Summary of All HUD Programs	2747	1955	71.2%	25	30	17
Public Housing	792	642	81.1%	30	33	10
Housing Choice Vouchers	1128	649	57.5%	21	28	27
Project Based Section 8	804	664	82.6%	26	30	-1
LIHTC	1255	887	70.7%	,		-

SOURCE: HUD PICTURE OF SUBSIDIZED HOUSING, NATIONAL HOUSING PRESERVATION DATABASE, 2019.

The Housing Choice Voucher program is significantly less concentrated in Watertown than other housing assistance programs, with 42.5 percent of Jefferson County voucher holders living outside the City. This type of rental assistance allows the family or household to choose where they would like to live by providing the family with a housing voucher that covers the cost of rent over 30 percent of their income. Voucher holders in Jefferson County and Watertown are more likely to live in a Census Tract with lower poverty levels than households in other HUD programs. The wait for this program is the longest, with families spending an average of more than two years on the waiting list.

Map 30 demonstrates that within the City of Watertown, the highest number (95) of households receiving tenant-based rental assistance live downtown. Families with tenant-based assistance are more likely to live on the northern half of Watertown, while census tracts 619, 622 and 612 on the South and East sides of the City have 36 or less households receiving tenant-based assistance. The neighborhoods with the lowest median household incomes, Downtown and the North East corner, are also more likely to have a higher number of households receiving tenant-based assistance.

MAP 30: TENANT BASED RENTAL ASSISTANCE BY CENSUS TRACT, CITY OF WATERTOWN

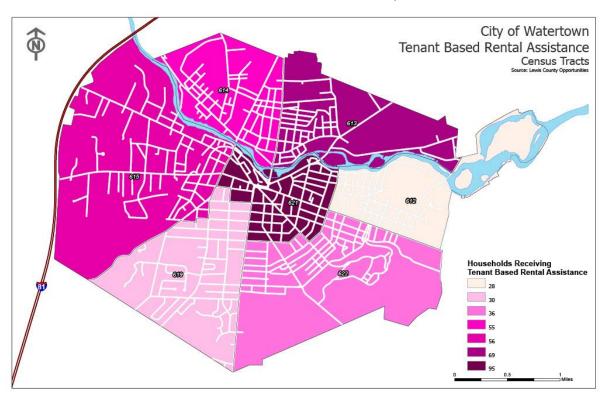


Table 8 below lists the races of subsidized housing residents. Interestingly, people of color are underrepresented in Jefferson County's subsidized housing, in contrast to national and statewide trends. Hispanic and Latino residents compose 4 percent of subsidized housing residents, but 7.4 percent of Jefferson County's population. This could potentially be due to the impact of Fort Drum soldiers in Census estimates, who are more diverse than the surrounding County but are less likely to live in subsidized housing programs administered by HUD.

TABLE 8: RACE & ETHNICITY OF SUBSIDIZED HOUSING RESIDENTS, JEFFERSON COUNTY, 2019

	%White	%Black		%Asian	
	Non-	Non-	%Native	or Pacific	%
	Hispanic	Hispanic	American	Islander	Hispanic
Summary of All HUD Programs	85	6	1	1	4
Public Housing	88	6	0	0	6
Housing Choice Vouchers	86	9	1	0	4
Project Based Section 8	81	3	1	1	4

SOURCE: HUD PICTURE OF SUBSIDIZED HOUSING, 2019.

Table 9 provides other demographic characteristics of Jefferson County subsidized housing residents. Subsidized housing residents are much more likely to have a female head of household, showing the importance of subsidized housing programs in supporting single mothers. Disability is also overrepresented in subsidized housing, especially among elderly heads of households.

TABLE 9: SELECTED DEMOGRAPHIC CHARACTERISTICS OF SUBSIDIZED HOUSING RESIDENTS, JEFFERSON COUNTY, 2019

					% with disability,	% with disability,	% with
					among Head,	among Head,	disability,
	Household				Spouse, Co-head,	Spouse, Co-head,	among all
	income	% very low	% extremely	% female	aged 61 years or	aged 62 years or	persons in
	peryear	income	low income	head	less	older	households
Summary of All HUD Programs	14121	92	67	70	44	48	26
Public Housing	15763	88	63	61	51	51	32
Housing Choice Vouchers	13962	95	72	73	44	95	25
Project Based Section 8	12684	94	65	75	35	23	21

Source: HUD PICTURE OF SUBSIDIZED HOUSING, 2019.

Housing Market & Vacancies

The City of Watertown struggles with high numbers of vacant and "zombie" homes, which can be damaging to neighborhood stability and have a high cost to local governments. Zombie properties are defined as homes that are both foreclosed and abandoned.³⁷ According to NeighborWorks America, one foreclosure can cost local governments as much as \$34,000 in direct costs such as inspections, court actions, police and fire department services, potential demolition, unpaid water and sewage, and trash removal.³⁸ Additionally, a foreclosure can result in as much as an additional \$220,000 in reduced property value and home equity of nearby homes.³⁹ However, while vacancy has increased, housing development countywide has also increased in recent years. These patterns in vacancy rates and development patterns in Watertown and Jefferson County are deeply connected to Fort Drum population trends. A housing market analysis completed for the City of Watertown in late 2016 found evidence of increased vacancy, which authors attributed to new inventory throughout the region, aging housing in the City, and stagnant population and household change.⁴⁰

There was substantial housing development in Jefferson County to house the influx of soldiers due to the Afghanistan and Iraq Wars in the first decade of the 21st century. Troop strength reached its height in 2011 with nearly 20,000 soldiers assigned to Fort Drum, creating a need for more housing. From 2010 to 2013, nearly 3,000 homes were created on and off base, increasing the ratio of soldiers living off base. According to the City of Watertown's Comprehensive Housing Analysis, the Fort Drum Regional Liaison Organization and the Development Authority of the North Country created the Community Rental Housing Program in 2005, which leveraged subsidies to create almost 1,500 new units in the Fort Drum market in response to the additional brigade. However, as troops were on various deployments, it became evident in late 2014 that the anticipated troop strength would not be reached and estimates were lowered from 18,000 to 15,100. As the soldier

³⁷ "Tracking down Watertown's zombie homes," Craig Fox, NNY 360, September 29, 2019,

 $https://www.nny360.com/top_stories/tracking-down-watertown-s-zombie-homes/article_91773cc4-77da-56aa-af89-b2216c79d22a.htm.$

³⁸ "Foreclosure Statistics," NeighborWorks America, N.D., https://www.fdic.gov/about/comein/files/foreclosure_statistics.pdf.

³⁹ Ibid

⁴⁰ "Comprehensive Housing Analysis: Watertown Housing Market and Vacant and Distressed Housing Concerns, 2016," GAR Associates.

⁴¹ Ibid.

⁴² Ibid.

population has decreased while new units have increased, the resulting vacancies have been felt across the housing market. Although many of these developments were built outside of Watertown, the result of higher regional supply has been felt in the city.

In 2018, the City of Watertown had a homeowner vacancy rate between 2.1 to 6.1 percent and a rental vacancy rate between 7.5 to 13.9 percent. In comparison, Jefferson County as a whole had a homeowner vacancy rate between 1.9 to 3.1 percent and a rental vacancy rate 6.5 to 9.9 percent, lower than Watertown but higher than New York State as a whole. These vacancy rates have a large range due to high margins of error and are likely to fluctuate to soldier deployment and the presence of seasonal homes. Table 10 demonstrates that a large percentage of vacant properties in Jefferson County are "for seasonal, recreational, or occasional use," consisting primarily of vacation homes and camps along Lake Ontario and the St. Lawrence River. Additionally, there is a large proportion of sold, unoccupied homes in Watertown.

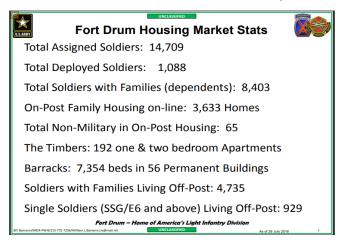
TABLE 10: VACANCY STATUS, 2018

Vacancy Status, 2018							
		Watertown					
		Margin of	Jefferson	County Margin			
	Watertown	Error	County	of Error			
For rent	823	±243	1736	±359			
Rented, not							
occupied	240	±158	394	±162			
For sale only	199	±100	646	±165			
Sold, not							
occupied	242	±135	746	±208			
For seasonal,							
recreational, or							
occassional use	82	±64	11164	±437			
For migrant							
workers	0	±22	0	±28			
Other vacant	504	±185	1848	±264			

SOURCE: 2018 ACS DATA.

Figure 19 breaks down the housing needs of soldiers. There are 3,633 homes on base for 8,403 soldiers with families, pushing many to live in off-post homes. In addition, 929 single soldiers live off-post as well. This comprises a sizable share of regional, market-rate homes, so the private market is greatly impacted by deployment and deactivation. Figure 20 shows the deep ties between soldier deployment and housing market vacancy regionally, with spikes in deployment corresponding to spikes in vacancy.

FIGURE 19: FORT DRUM HOUSING MARKET STATISTICS, 2016



SOURCE: COMPREHENSIVE HOUSING ANALYSIS, WATERTOWN HOUSING MARKET AND VACANT AND DISTRESSED HOUSING CONCERNS, 2016, GAR ASSOCIATES.

Local Area Housing Market Vacancy vs. Soldiers Deployed

14.00%

—Housing Market Vacancy %
—Soldiers Deployed

10.00%

—Soldiers Deployed

10.

FIGURE 20: LOCAL AREA HOUSING MARKET VACANCY VS. SOLDIERS DEPLOYED, 2016

SOURCE: COMPREHENSIVE HOUSING ANALYSIS, WATERTOWN HOUSING MARKET AND VACANT AND DISTRESSED HOUSING CONCERNS, 2016, GAR ASSOCIATES.

The Comprehensive Market Analysis completed for the City of Watertown in late 2016 further analyzed Watertown vacancy rates. Although this data is outdated, analysis still provides insight into the character and patterns of Watertown vacancy rates. Findings indicated that levels of vacant single family and rental homes have increased. Physical vacancy for market rate housing in Watertown was extremely high at 12.55 percent, while levels of physical vacancy in affordable housing were very low at 1.96 percent, as shown in Table 11. This shows the high demand for affordable homes. Table 12 demonstrates that vacancy patterns in Jefferson County were very similar to those in Watertown. At the time of the 2016 Comprehensive Market Analysis study, high levels of physical vacancy for market rate rental homes in Watertown and Jefferson County were largely impacted by former Section 801 housing originally built for military families and that are now privately-owned. When vacancy

in former Section 801 complexes was excluded, market rate vacancy fell to 4.55 percent, bringing Watertown's vacancy rate below that of the region. In 2017, a year after the GAR study, owners of three former 801 complexes moved forward with \$6 million in renovations after a refinancing package removed the properties from receivership and foreclosure proceedings.⁴³ Additionally, 20% of the 580 units were converted to affordable housing.

Outreach to property managers of former Section 801 complexes in November 2020 found that although occupancy may currently be higher, vacancy levels still fluctuate. Both property managers contacted had high levels of occupancy of 98.3% and 96.9% but remarked that they struggled to fill apartments earlier in the year, with one complex struggling at 63-68% occupancy for three months. One property manager described occupancy levels as a "roller coaster" and pointed to deployment as the primary cause of these fluctuations, especially as the complex is located right next to Fort Drum. One property manager also noted that their complex's affordable units generally had lower vacancy rates than market rate units.

Community outreach for the City of Watertown's 2016 Consolidated Plan also found that property owners have noted an increase in vacancies in older apartment complexes, which is also likely attributed to a combination of factors such as troop reduction, competition from newer complexes, and housing quality. Additionally, Fort Drum has recently combated vacancy in on-post housing due to base-relocation by inviting civilians to live on-base in housing formerly reserved for troops.⁴⁴ All on-post housing is run by Fort Drum Mountain Community Homes, which expressed a need to increase occupancy to generate revenue and keep up maintenance.

TABLE 11: VACANCY RATES FOR MARKET RATE AND AFFORDABLE HOUSING UNITS, WATERTOWN, 2016

Market Rate - City of Watertown Surveyed							
Type Total Units Total Available Stated Occupancy Physical Vacan							
Market Rate	1633	205	94%	12.55%			
Affordable	2344	46	99%	1.96%			
Totals	3977	251	97%	6.31%			

SOURCE: COMPREHENSIVE HOUSING ANALYSIS, WATERTOWN HOUSING MARKET AND VACANT AND DISTRESSED HOUSING CONCERNS, 2016, GAR ASSOCIATES.

TABLE 12: VACANCY RATES FOR MARKET RATE AND AFFORDABLE HOUSING UNITS, JEFFERSON COUNTY, 2016

Market Rate - Jefferson County Surveyed								
Type Total Units Total Available Stated Occupancy Physical Vacano								
Market Rate	3033	408	90%	13.45%				
Affordable	4224	85	99%	2.01%				
Totals	7257	493	95%	6.79%				

SOURCE: COMPREHENSIVE HOUSING ANALYSIS, WATERTOWN HOUSING MARKET AND VACANT AND DISTRESSED HOUSING CONCERNS, 2016, GAR ASSOCIATES.

In the homebuyers' market, there is a large discrepancy between the price and time spent on the market between move-in ready and not move-in ready homes in Watertown, which influences the owner-occupied vacancy rate. Homes that are ready for families may sell quickly at high prices, while homes that need work may remain on the market for long periods of time. This contributes to the perception that Watertown has a slow housing market,

⁴³ "Apartments due for repairs refinancing package: Owners of three complexes close on \$30m deal," Craig Fox, *NNY360*, June 17, 2017, https://www.nny360.com/news/apartments-due-for-repairs-refinancing-package-owners-of-three-complexes-close-on-30m-deal/article-7a143d7c-e36d-5dae-9790-d642307c6b56.html.

⁴⁴ Julia Botero, "Looking for a new home? Fort Drum invites civilians to live on base," WRVO Public Media, February 18, 2016, https://www.wrvo.org/post/looking-new-home-fort-drum-invites-civilians-live-base.

while it actually may function as two separate housing markets. Additionally, as with many other cities, the region has shifted closer to a seller's market with the COVID-19 pandemic. However, although waterfront sales in Jefferson County have especially increased dramatically, there may be a spike in zombie foreclosures homes as homeowners struggle to keep up with payments due to the economic impact of the pandemic.⁴⁵

One impact of the slow market for homes that are not move-in ready is the large number of zombie homes in Watertown. The 2016 Comprehensive Housing Analysis found approximately 253 vacant single- or two-family homes in the City of Watertown. This is about 1.9 percent of all housing units and 4.8 percent of all owner-occupied homes. A November 2019 news report stated the City had identified 246 vacant and zombie homes and that the number was rising as more homes were identified.⁴⁷ In early 2020, Watertown was the zip code with the second highest rate of owner-vacated properties in the nation.⁴⁸ Many soldiers may purchase homes because it is less expensive than renting, but then may just walk away or do short sales when they are relocated and are unable to sell the properties. Additionally, bank-owned and short sales have increased from less than 1 percent of City and County sales in 2011 to 28 percent of City and 17 percent of County sales in 2016, according to the Jefferson-Lewis Board of Realtors.⁴⁹ This is likely partially attributed to the new foreclosure laws, as banks do not want to take care of properties after an owner walks away. In addition, new protections took effect in 2012 to allow military personnel the option of a short sale even if they were not behind on payments.

The City's Vacant Home Initiative and Zombie Task Force was awarded a grant from New York State to help address these issues. Their multi-pronged initiative works to combat blight through increased code enforcement capacity and technology, the creation of a Task Force Committee to develop a strategy to increase public awareness and connect foreclosure at-risk homeowners with resources to keep their homes, and working with financial institutions to self-report vacant homes to the City. Although the City did not receive state funding for this initiative in 2020, they aim to keep this a priority. Additional measures include a local law requiring vacant property owners to register with the city and pay fees if their vacant building has code violations and requiring all landlords in Watertown to register their property, making it easier to identify property owners and keep homes up to code. Community outreach for the 2019 Comprehensive Plan found resident support for city-wide rehabilitation of older and vacant homes, expanded Code Enforcement staffing, and consideration for the creation of a land bank.

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⁴⁵ Katie Benoit, "Fleeing NYC and COVID, buyers snap up Waterfront Homes in Jefferson County," WWNY, September 15, 2020, https://www.wwnytv.com/2020/09/15/fleeing-nyc-covid-buyers-snap-up-waterfront-homes-jefferson-county/.

⁴⁶ Michael Gerrity, "Coronavirus pandemic driving spike in zombie foreclosure homes in U.S.," World Property Journal, August 27, 2020, https://www.worldpropertyjournal.com/real-estate-news/united-states/irvine/real-estate-news-coronavirus-impact-on-home-foreclosures-in-2020-attom-data-solutions-foreclosure-report-home-foreclosure-data-in-2020-12099.php.

⁴⁷ Katie Benoit, "246 and rising -- getting a handle on Watertown's vacant homes," WWNY, November 20, 2019, https://www.wwnytv.com/2019/11/20/rising-getting-handle-watertowns-vacant-homes/.

⁴⁸ "Vacant zombie foreclosures increase to 3.1 percent nationwide," ATTOM Data Solutions, February 27, 2020, https://www.prnewswire.com/news-releases/vacant-zombie-foreclosures-increase-to-3-1-percent-nationwide-301012107.html.

⁴⁹ "Comprehensive Housing Analysis: Watertown Housing Market and Vacant and Distressed Housing Concerns, 2016," GAR Associates.

⁵⁰ Sarah Harris, "Watertown rental registration aims at reducing 'zombie' housing," North Country Public Radio, December 2017, 2018, https://www.northcountrypublicradio.org/news/story/35282/20171218/watertown-rental-registration-aims-at-reducing-zombie-housing.

FAIR HOUSING OUTREACH AND ENFORCEMENT CAPACITY

There is concern that many Watertown residents do not know their fair housing rights, while housing providers do not know their responsibilities. However, effort is being made to educate the public on their rights and responsibilities. For example, the Community Action Planning Council of Jefferson County reported in 2019 that 62 people attended their Annual Fair Housing Roundtable and 17 individuals were assisted with problems related to housing discrimination. The City of Watertown has also supported fair housing education and outreach through contracts with CNY Fair Housing, the author of this report, in 2017, 2018, and 2019. Under these contracts, CNY Fair Housing has conducted trainings for 322 attendees including the Jefferson County annual roundtables. In addition, the agency has conducted billboard advertising in the area on familial status, military status, and disability discrimination. However, outreach directly to tenants and other residents has been less successful and should be an area of focus for future activities.

The City of Watertown has several layers of fair housing enforcement options. However, residents' knowledge of these options seems limited. The City's Fair Housing Officer, the City Manager, receives few fair housing complaints. In addition, the Community Action Planning Council serves as the Fair Housing Officer for Jefferson County, and as noted earlier, assisted 17 individuals with fair housing related issues in 2019. CNY Fair Housing also serves the area as a private Fair Housing Enforcement Organization and receives referrals from the community, particularly the Community Action Planning Council. In the last five years, CNY Fair Housing has received 46 complaints from Watertown residents. Of these complaints, 12 were not related to fair housing, 14 had a fair housing issue but did not warrant further investigation, and 20 resulted in investigations by the agency. In six of the cases CNY Fair Housing investigated, the agency successfully advocated for reasonable accommodations for clients. No legal action was taken in any of these complaints. In addition to these local options, Watertown residents can file fair housing complaints with the New York State Division of Human Rights or HUD. In coming years, enforcement capacity should be expanded to include additional fair housing testing, particularly related to familial status, source of income, race, and national origin.

⁵¹ "Comprehensive Housing Analysis: Watertown Housing Market and Vacant and Distressed Housing Concerns, 2016," GAR Associates.

IDENTIFICATION OF IMPEDIMENTS AND RECOMMENDATIONS

IMPEDIMENTS/RECOMMENDATIONS

Some of the impediments identified may be relatively easy to address and the recommendations can be accomplished within a short period of time. Many of the recommendations are items that the City has already proposed or is working on.

IMPEDIMENT 1:

Lack of quality, affordable housing limits housing options for protected class members. Forty-two percent of rental households in the City of Watertown are cost burdened. Vacancy rates for affordable housing are less than two percent, indicating a very high demand for this housing. Housing quality is a concern, particularly given the age of the housing stock in the City. Over 80 percent of Watertown homes were built before the ban of lead paint in 1979 and 155 of 3,007 (5.2 percent) screened children were lead poisoned in 2018.⁵² There are high levels of housing instability with 50-to-60 percent of renters moving yearly. ⁵³

- Strengthen code enforcement system.
 - Strengthen the rental registry to require inspections of rental properties.
 - Create a user-friendly database of codes complaints that will allow tenants to search
 property and landlord complaint history. Ensure the database is mobile friendly to allow
 easier access for residents with limited internet access.
 - Set up stricter penalties against landlords with outstanding code violations such as fines, denials of construction permits, evictions, or inability to purchase a property from the City.
 - Require lead paint tests in codes inspections.
- Develop incentives to convert market-rate apartments struggling with high levels of vacancy to affordable housing.
- Promote and incentivize mixed income properties and neighborhoods through both the development of affordable housing in market-rate neighborhoods and the development of market-rate housing in high-poverty neighborhoods such as Downtown.
 - Use City of Watertown Zoning Ordinance rewrite as an opportunity to promote mixeduse and mixed-income development as the City shifts to form-based codes.
 - Advocate New York State legislators to develop and fund tax credit programs that
 prioritize mixed-income and scattered-site development and rehabilitation to incentivize
 redevelopment and prioritize affordable housing without the consequence of
 concentrated poverty, as seen in Downtown Watertown.
- Address housing instability among renters.
 - Create early intervention programs that provide support to tenants when they first become late on rent. Programs can include rental support, financial counseling, and social

⁵² "2018 Annual Report," Jefferson County Public Health Service, https://co.jefferson.ny.us/media/Public%20Health/2018%20Annual%20Report.pdf.

⁵³ Ibid.

work support to address barriers to financial stability. Consider the Eviction Pilot Program executed by Syracuse Housing Authority as a model.

- Continue investment into rental rehabilitation programs.
 - Since Project Year 2016, 89 affordable rental units have been rehabilitated and additional projects are in progress.⁵⁴ Complete outreach to encourage more landlords to participate in existing programs.

IMPEDIMENT 2:

Vacant housing and zombie properties undermine neighborhood stability and revitalization efforts. The vacancy rate for market-rate housing has been as high as 12 percent in recent years which is a result of new inventory throughout the region, aging housing in the City, and stagnant population and household change. As of November 2019, the City of Watertown had identified 246 vacant homes.⁵⁵

- Continue zombie home rehabilitation and prevention programs.
 - Identify problem homes, blocks and neighborhoods and be proactive in helping slow the growth of vacancy and dilapidation.
 - Continue efforts to rehabilitate homes in all neighborhoods as an effort to decrease the concentration of poverty in certain areas, as stated in the 2016-2020 Consolidated Plan.
 - Continue to expand the Owner-Occupied Housing Rehabilitation program, funded by CDBG and implemented by Neighbors of Watertown. The program is funded for the rehabilitation of approximately 8 owner occupied units in FY 2020.⁵⁶ Since Program Year 2016, 44 homes have been rehabilitated and many projects are still in-progress.⁵⁷
 - Continue to expand and fund the NDC Housing Program, which stabilizes properties
 acquired by the City through the tax foreclosure process while a long-term
 redevelopment plan is being established. The 2020 Action Plan aims to stabilize five
 foreclosed units during the fiscal year.
 - Utilize NYS Brownfield Opportunity Areas Program to redevelop vacant and blighted parcels following the tasks listed in the 2019 Comprehensive Plan.
- Create a Jefferson County Land bank or expand existing programs that facilitate the
 redevelopment of vacant properties, such as the Buy / Rehab / Resell Housing Rehabilitation
 Program. This program is a partnership between Neighbors of Watertown and the City of
 Watertown Local Development Corporation, which buys and rehabilitates substandard homes
 and makes them available to first time homebuyers.

⁵⁴ "Consolidated Annual Performance Evaluation Report: Program Year 2019," City of Watertown Planning & Community Development Department, September 4, 2020 Draft, https://www.watertown-ny.gov/DocumentView.asp?DID=1968.

⁵⁵ Katie Benoit, "246 and rising -- getting a handle on Watertown's vacant homes," WWNY, November 20, 2019, https://www.wwnytv.com/2019/11/20/rising-getting-handle-watertowns-vacant-homes/.

⁵⁶ "Annual Action Plan Program Year 2020," City of Watertown Planning and Community Development Department, https://www.watertown-ny.gov/DocumentView.asp?DID=1903.

⁵⁷ "Consolidated Annual Performance Evaluation Report: Program Year 2019," *City of Watertown Planning & Community Development Department*, September 4, 2020 Draft, https://www.watertown-ny.gov/DocumentView.asp?DID=1968.

 Work with Fort Drum to better plan for and anticipate troop fluctuations that impact the housing market.⁵⁸

IMPEDIMENT 3:

There are significant disparities in homeownership rates by race and ethnicity, limiting the ability of people of color to build household wealth. The homeownership rate for white, non-Hispanic households (44.4%) is nearly three times the rate for Black households (14.3%) and more than double the rate for Hispanic households (18.0%). Only 10 percent of home purchase loan applications are applicants of color even though people of color are over 20 percent of the population.

- Improve homeownership opportunities.
 - Create financial counseling programs, including financial literacy programs for high school students and non-military residents.
 - Expand homeownership counseling programs, such as the Neighbors of Watertown's First Time Home Buyer Education course.
 - Expand down payment assistance programs and work with local lenders to make firsttime homebuyer programs more available.
 - The 2020 CDBG Action Plan allocates \$150,000 for the 2020 fiscal year to the Homebuyer Program, administered by Neighbors of Watertown, with the goal of providing direct assistance to six households. Neighbors of Watertown also uses state and federal funds for this program.⁵⁹ Seven first time homeowners were assisted through this since the 2016 Program Year. There is a long waitlist for this program and many applicants have been on the list for over a year or more, indicating a high need.⁶⁰
 - Promote Black and Hispanic homeownership including through affirmative marketing programs and partnerships with local organizations.
 - Work with Neighbors of Watertown to target the sale of properties from the Buy / Rehab / Resell Housing Rehabilitation Program to communities with lower homeownership rates.
 - Promote Section 8 homeownership for voucher holders; work with local housing authorities and lenders to expand Section 8 homeownership.
 - Identify and expand on programs that provide alternative mortgage lending options that allow for funding for housing rehabilitation.

⁵⁸ "2019 Comprehensive Plan," City of Watertown.

⁵⁹ "First Time Home Buyer," Neighbors of Watertown, https://www.neighborsofwatertown.com/housing-programs/1st-time-home-buyer.html.

⁶⁰ "Annual Action Plan Program Year 2020," City of Watertown Planning and Community Development Department, https://www.watertown-ny.gov/DocumentView.asp?DID=1903.

IMPEDIMENT 4:

A large percentage of the population has disabilities, particularly ambulatory difficulties, which creates a need for accessible housing. Over 17 percent of Watertown's population have a disability, over 40 percent higher than the national average. Individuals with disabilities are concentrated within geographic areas.

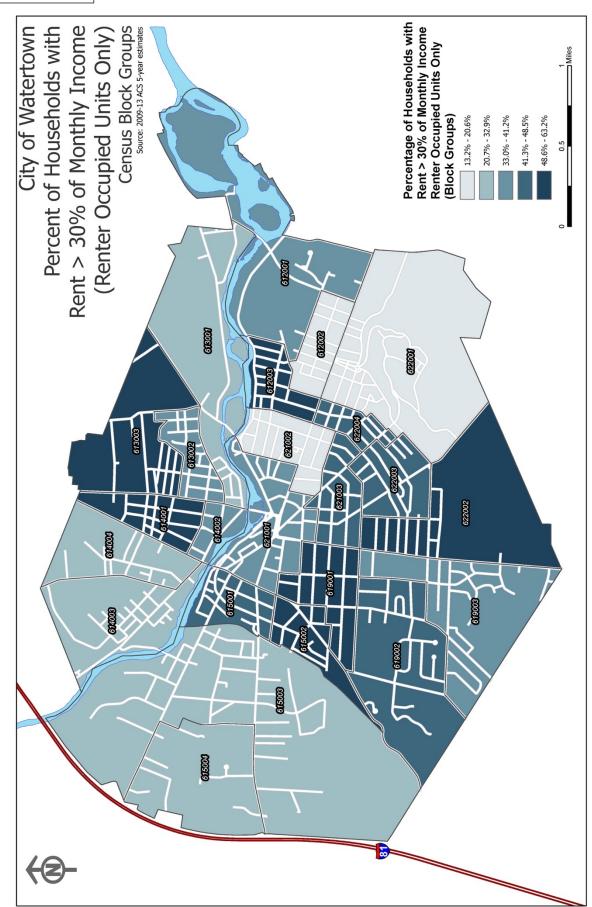
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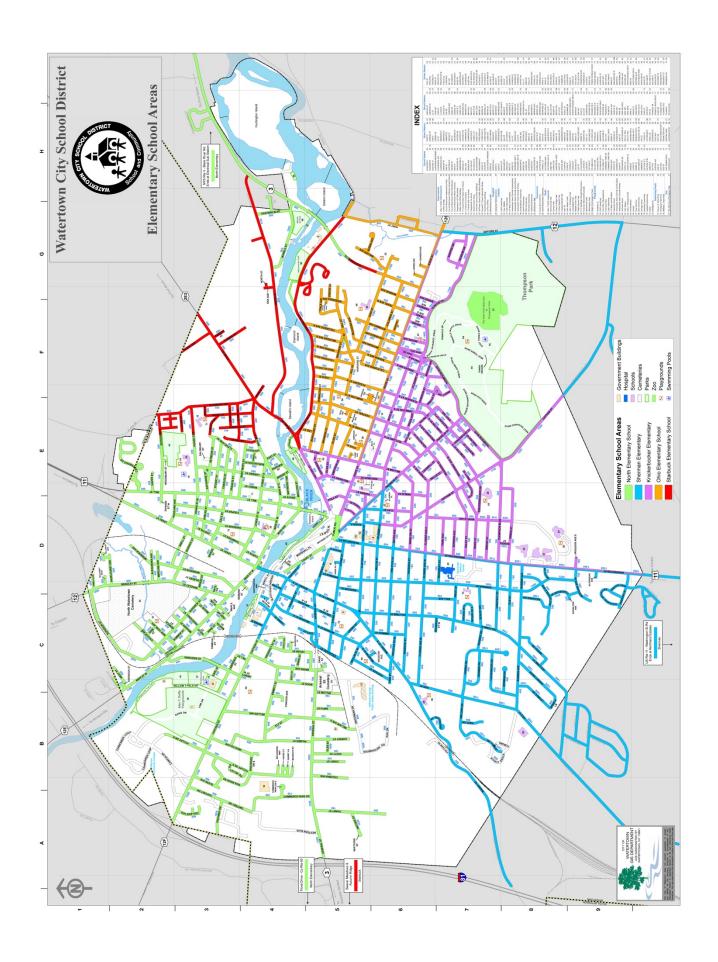
- Identify and support scattered site housing options that promote integration of people with disabilities into the community.
 - Continue investment in public infrastructure projects that improve accessibility in all Watertown neighborhoods, such as the 2020 Thompson Park ADA Ramp Construction Project.
- Develop incentives for creating accessible housing or modifying homes to be more accessible.
- Assure that all new construction or substantial rehabilitation complies with required
 accessibility guidelines. Monitor new construction prior to completion to identify
 accessibility violations while they are easier to correct.
- Explore passage of a visitability regulation that requires all new construction of both multi and single-family homes to have:
 - one zero-step entrance;
 - doors with 32 inches of clear passage space;
 - one bathroom on the main floor you can get into in a wheelchair.

IMPEDIMENT 5:

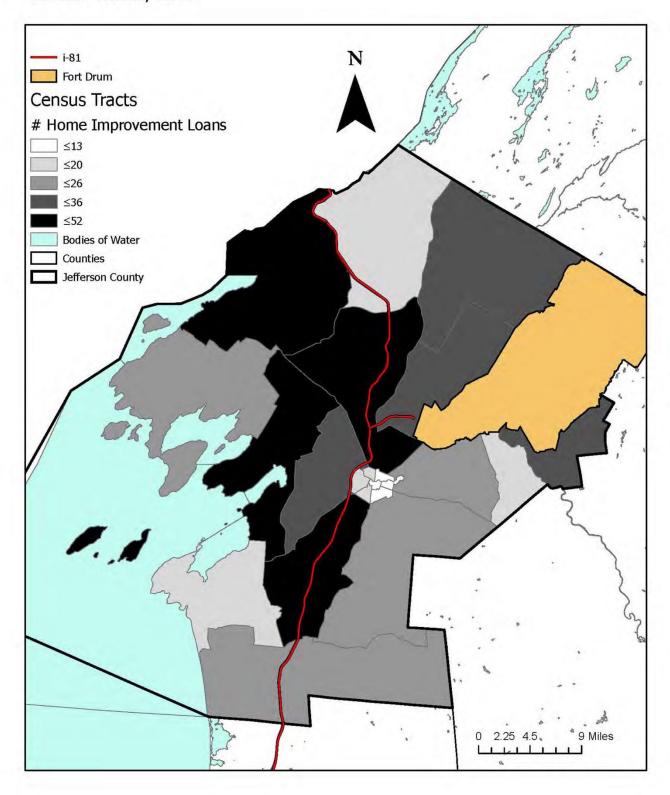
Housing discrimination and lack of knowledge of fair housing rights continues to limit housing opportunities. Most tenants have little knowledge of their fair housing rights and housing providers are often unaware of their fair housing responsibilities particularly around detailed issues such as reasonable accommodations and source of income.

- Continue support for fair housing education and outreach programs. Target programs to reach tenants directly through written, digital, and in-person activities.
- Support fair housing enforcement programs including fair housing testing of housing providers in the rental, sales, and lending markets.
- Include fair housing education materials in all housing assistance programs.
- Partner with other municipalities within Jefferson County to expand reach of fair housing education programming.
- Require that all subrecipients of CDBG funds complete fair housing training.

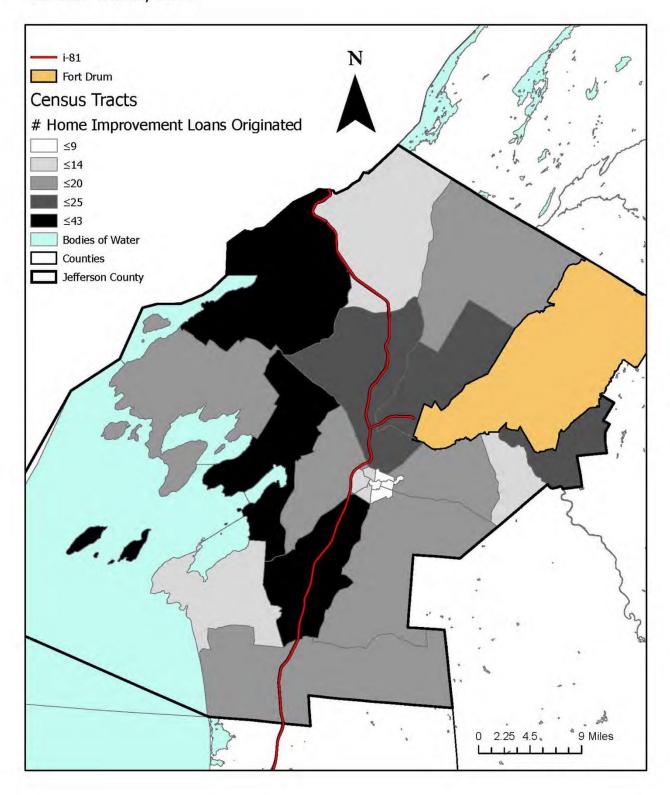




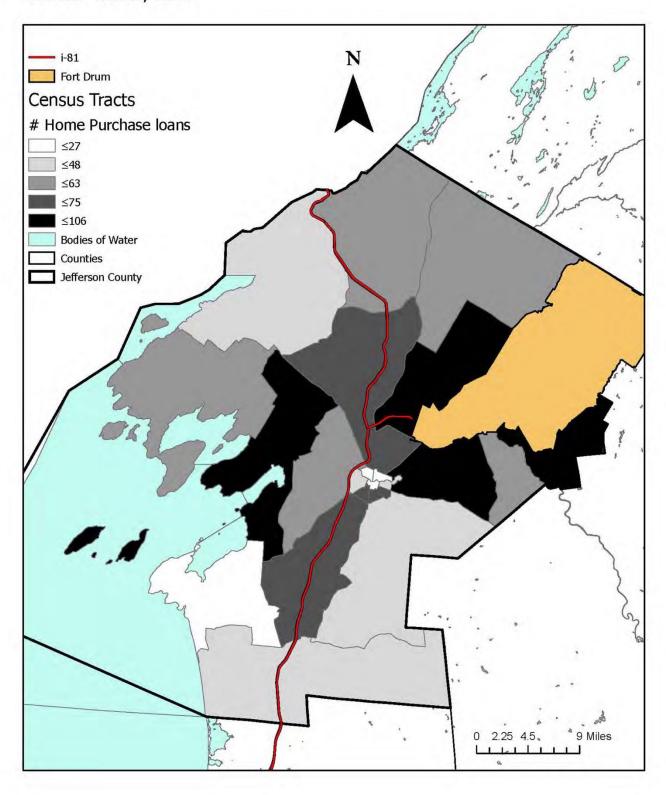
Number of Home Improvement Loan Applications, Jefferson County Census Tracts, 2017



Number of Originated Home Improvement Loans, Jefferson County Census Tracts, 2017



Number of Home Purchase Loan Applications, Jefferson County Census Tracts, 2017



Number of Originated Home Purchase Loans, Jefferson County Census Tracts, 2017

